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June 28, 2017

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Sent via: comments-pacificnorthwest-deschutes@fs.fed.us

RE: Central Cascades Wilderness Strategies Comments

Dear Forest Supervisors,

The following comments on the Central Cascades Wilderness Strategies Comments come from Wilderness Watch, a national wilderness conservation organization focused on the protection of wilderness character of all units of the National Wilderness Preservation System, including the five Wildernesses in this Central Cascades Wilderness project (Three Sisters, Mount Jefferson, Mount Washington, Wale Lake, and Diamond Peak Wildernesses).

As we understand the proposal, the Forest Service is looking at five categories of options to control visitor use in these Wildernesses so as to better protect the conditions within them: Instituting a Permit System, Campfire Ban, Campfire Setback, Camping Setback/Restriction, and Education.

Permit System. Some permit systems have had some success in better distributing visitor use in Wilderness and in limiting visitor numbers in high-use areas, both for overnight use as well as day use.

Wilderness Watch strongly recommends that any permit system be set up as a “first come, first served” system open to all members of the public. In some areas, commercial outfitters have demanded a portion of the total visitor permits up front for use by their customers, but Wilderness Watch strongly opposes any permit system where commercial users automatically receive a segment of the permits.

We strongly encourage the Forest Service to operate any permit system in-house, certainly in the start-up years. The “Rec.gov” site is not well-suited to a new, start-up permit system for which the public will likely have many questions.

Wilderness Watch strongly opposes implementing a user fee under the Federal Lands Recreation Enhancement Act (FLREA). Beyond our opposition to user

fees for visiting Wilderness, FLREA is controversial and its long-term status is uncertain. Don't hitch this new permit system to a fee structure that may disappear down the road.

Campfire Ban. Wilderness Watch could support a campfire ban above certain elevations in these five Wildernesses. Though we understand that each of the five areas has individual differences, we believe that a consistent elevation level for a campfire ban would be easiest for the public to remember and follow, rather than different elevation limits in each of the five areas.

Campfire Setback. Currently there is a campfire setback of 100 feet of trails and water. It appears from the chart on page 12 of the May 31 project document that the Forest Service may discontinue this regulation and replace it with increased user-education. We doubt that increased education alone will protect these areas. Moreover, given the budget situation and Forest Service funding priorities, we seriously doubt that the districts will be able to provide the education needed. Wilderness Watch supports retaining this setback regulation and augmenting it with better user education.

Camping Setback/Restriction. Currently there is designated camping and specified setbacks at certain areas. The proposal seems to call for ending these regulations and replacing them with increased user-education. As above, Wilderness Watch supports retaining the existing regulations and augmenting them with increased user education. An exception would be if the Forest Service is confident that eliminating the designated campsites won't lead to a proliferation of new, degrading campsites. In that case, we believe in allowing visitors the maximum amount of freedom to travel and camp where they choose.

Education. Wilderness Watch supports an increased Forest Service presence and increased visitor education for these five Wildernesses. We believe the increased effort should largely occur before visitors enter the Wilderness, such as at trailheads or other areas where visitors can be reached. We support a greater wilderness ranger presence and program in these Wildernesses, though not necessarily a heavier presence in terms of visitor contacts. Some areas, such as the Boundary Waters Canoe Area Wilderness in Minnesota, already require visitors to watch a user education video when picking up wilderness permits, and this has proven to be a positive tool.

We also suggest analyzing indirect methods for limiting or reducing impacts in these Wildernesses that don't confine visitors once they enter. These indirect actions could include discouraging marketing of the areas, providing more primitive trailheads and access to trailheads, lower trail standards and maintenance levels, and fewer developments designed to facilitate easier access.

Please keep Wilderness Watch on the contact list for this project as it moves forward.

Sincerely,



Kevin Proescholdt
Conservation Director