



WILDERNESS WATCH

Keeping Wilderness Wild

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Minneapolis, MN Office

2833 43rd Avenue South

Minneapolis, MN 55406

(P) 612.201.9266

Moscow, ID Office

P.O. Box 9623

Moscow, ID 83843

(P) 208.310.7003

May 21, 2018

John Allen, Forest Supervisor
Deschutes National Forest
63095 Deschutes Market Road
Bend, OR 97701

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

RE: Central Cascades Wilderness Strategies

Dear Forest Supervisor,

The following comments on the Central Cascades Wilderness Strategies Project 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, Waldo Lake, and Diamond Peak Wildernesses).

As we understand the proposal, the Forest Service is proposing a number of options to control visitor use in these Wildernesses so as to better protect the conditions within them. Our specific comments follow:

1. Wilderness Watch can Support a Properly-Designed 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. The permit system for the Boundary Waters Canoe Area Wilderness (BWCAW) on the Superior National Forest in Minnesota is one such example. Whatever system the Forest Service adopts, the agency must include monitoring of the current lesser-used areas so that the permit system doesn't merely result in the trashing of the lesser-used areas by increased visitor use of them.

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 elsewhere in the country, commercial outfitters

demand a portion of the total visitor permits up front for use by their customers, but Wilderness Watch strongly opposes any permit system where commercial clients automatically receive a segment of the permits. The Forest Service has successfully resisted such calls by commercial outfitters over the years for the BWCAW permit system.

Wilderness Watch also supports a minimum of visitor constraints once visitors have entered the Wilderness. In other words, wilderness visitors should not be forced to travel assigned routes, or camp at assigned locations. The freedom to travel and experience Wilderness unencumbered by assigned routes or assigned camping areas is very important to preserve. Again, the BWCAW permit system allows this freedom by and large.

We strongly encourage the Forest Service to operate any permit system in-house, certainly in the start-up years. The "Recreation.gov" site is not at all well-suited to a new, start-up permit system for which the public will likely have many questions. Moreover, using Recreation.gov guarantees that an administrative fee will be imposed by a profit-driven company.

2. Wilderness Watch Strongly Opposes any "User Fee" as part of any Permit System.

Wilderness Watch strongly opposes implementing any 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. Any fees imposed on the public for this new permit system must be low and cover ONLY the actual cost to the Forest Service of the reservation system. User fees must be kept out!

The press reports that the new reservation fee may run from \$6 to \$12, though the EA states that the reservation fee will be determined later. Rather than punt the decision now as to what the actual fee will be, the Forest Service should instead be honest with the public and determine what that reservation fee will be now. And the Forest Service should then analyze the impacts of any new reservation fee on displacing visitors.

3. Wilderness Watch Strongly Opposes any Exemptions in a new Permit System.

We understand that the Forest Service is considering allowing exemptions from the permit system to select groups, such as hunters or Pacific Crest Trail through-hikers (see, for example, EA pp. 14-15 and 56-57.) This must not be allowed! All user groups impact wilderness character and crowding, and all members of the public must be required to use the same permit system.

In the Boundary Waters Canoe Area Wilderness in Minnesota, for example, the permit system there does not operate under any carve-outs for any particular user groups like hunters or through-paddlers. All hunters are required to acquire visitor permits for the BWCAW, even if just for scouting trips. Paddlers going through the BWCAW to reach Quetico Provincial Park, a wilderness park on the Ontario side of the border, are also required to acquire permits, even if they will paddle through the BWCAW for only part of one day. All visitors impact the Central Cascade Wildernesses, too, and all visitors must be subject to any new permit system. To the best of our knowledge, none of the other permit

systems that the Forest Service operates across the country for Wilderness or Wild Rivers has carve-outs like those being suggested with this Central Cascades Wilderness Project.

Avoiding such exemptions in the new permit system will also make it easier for the public to accept the permit system. If exemptions are allowed, the public at large may rightly question why hunters are exempted but they are not. The permit system instead must apply to all segments of the public.

4. Wilderness Watch Supports a High-Elevation Campfire Ban. Wilderness Watch can support a campfire ban above certain elevations in these five Wildernesses. Visitor impacts to slow-growing trees at higher elevations can cause significant resource damage.

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.

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

6. Retain the Camping Setback/Restriction. Currently there is designated camping and specified setbacks at certain areas in the Central Cascades Wildernesses. The proposal calls for ending designated campsites 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 might be if the Forest Service is confident that eliminating the designated campsites won't lead to a proliferation of new campsites that degrade new areas. If the Forest is confident that campsite proliferation will not occur, we do believe in allowing visitors the maximum amount of freedom to travel and camp where they choose.

7. Wilderness Watch Supports Increased Visitor 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 other Wildernesses, 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 an effective and 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,

A handwritten signature in dark ink that reads "Kevin Proescholdt". The signature is written in a cursive, flowing style.

Kevin Proescholdt
Conservation Director