



WILDERNESS WATCH

Keeping Wilderness Wild

November 25, 2019

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Willamette National Forest
ATTN: Recreation Fees
3106 Pierce Parkway, Suite D
Springfield, OR, 97477

Sent via: WillametteRecFeeComments@usda.gov

Dear Forest Service Staff:

Wilderness Watch is submitting these comments on the proposed new fees for accessing the Central Cascades Wildernesses on the Willamette and Deschutes National Forests in Oregon. Wilderness Watch is a national wilderness conservation organization focused on the protection of the units of the National Wilderness Preservation System.

Wilderness Watch commented in favor of the new permits and quotas for limiting and dispersing use in the Central Cascades Wilderness Strategies Project on May 21, 2018, but we also wrote in that same letter that “Wilderness Watch Strongly Opposes any ‘User Fee’ as part of any Permit System.”

Wilderness Watch opposes these proposed new fees for the following reasons:

- **The Proposed Fees Violate the Federal Lands Recreation Enhancement Act (FLREA), P.L. 108-447.** The Forest Service incorrectly claims authority for charging such fees under a clause in the Federal Lands Recreation Enhancement Act (FLREA) that allows a fee for “specialized recreation uses” such as “group activities, recreation events, and motorized recreational vehicle use.” (FLREA, Sec. 3[h]).

Congress never meant “specialized recreation uses” to apply to private individuals who are hiking, walking, horseback riding and camping in a completely undeveloped part of a National Forest. Fees misused in this manner would set a horrible national precedent for other Wilderness areas around the country.

In fact, FLREA specifically prohibits charging fees for the following:

(1) **PROHIBITION ON FEES FOR CERTAIN ACTIVITIES OR SERVICES.**--The Secretary shall not charge any standard amenity recreation fee or expanded amenity recreation fee for Federal recreational lands and waters administered by the Bureau of Land Management, the Forest Service, or the Bureau of Reclamation under this Act 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.

FLREA, Sec. 3(d)(1)

The Forest Service simply cannot impose these new fees under the authority of FLREA.

- **The Amount of the Proposed Fee is Exorbitant.** For example, for an eight-person group that seeks to complete a 10-day backpacking trip in one of the affected Wildernesses, the fee will jump from its current amount of \$0 to \$406 (\$5/person/day + \$6 reservation fee). Fees at this level will hinder lower- and modest-income people from visiting these Wildernesses.

- **The Proposed Fees will further Commercialize and Commodify Wilderness.** The proposed fees violate the intent and purpose of the Wilderness Act, including protecting Wilderness from commercialization and commodification. It is simply unjust to charge people to visit Wilderness areas, which belong to all Americans. They are our irreplaceable birthright as citizens, open to all, not just those wealthy enough to pay fees. We already support our Wildernesses through our taxes, and the agency should redirect existing funding to support its wilderness program. Nearly 20 percent of national forest lands are designated Wilderness, yet the agency commits only one percent to wilderness stewardship. The Forest Service gives away far more in subsidies to private interests in the logging, livestock grazing, private fire-fighting, and oil and gas industries.

- **The Forest Service should seek Additional Appropriations from Congress if Needed.** If the Forest Service needs additional funding for wilderness stewardship work, the agency should seek that additional funding from Congress through the appropriations process. This is a far more appropriate way to acquire the funding needed for wilderness stewardship.

Sincerely,



Kevin Proescholdt
Conservation Director