



December 28, 2018

Regional Forester, Objection Reviewing Officer,
Pacific Northwest Region, USDA Forest Service,
Attn: 1570 Appeals and Objections, PO Box 3623,
Portland, OR 97208-3623.

Submitted Via Email: objections-pnw-regional-office@fs.fed.us

Re: Central Cascades Wilderness Strategies Project-DRAFT DECISION

Overview

Access Fund, the American Alpine Club, the Mazamas, and Leavenworth Mountain Association are filing an objection regarding aspects of the Central Cascades Wilderness Strategies Project-DRAFT Decision Notice (DN) and request review and an objection resolution meeting. The Central Cascades Wilderness Strategies Project was initiated in 2017 with an overarching goal of reducing recreation-related impacts and preserving the Wilderness character of Mount Jefferson Wilderness, Mount Washington Wilderness, Three Sisters Wilderness, Waldo Lake Wilderness, and Diamond Peak Wilderness. The undersigned organizations submitted comments in May 2018 during the public comment period. There are several important traditional mountaineering opportunities in these Wilderness areas including iconic day-use climbing objectives, like Jefferson Park Glacier, the North Ridge of Mt. Washington, and South Sister. We recognize the importance of managing visitor impacts to protect Wilderness character and natural resources, however we do not support aspects of the selected Alternative 4 Modified in the DN. The DN proposes a seasonal limited entry permit system be implemented within the Mt. Jefferson, Mt. Washington, and Three Sisters Wilderness areas at 30 trailheads for day use and at all trailheads for overnight use.

Objections

Previous comments submitted by Access Fund, the American Alpine Club, the Mazamas, and Leavenworth Mountain Association during the Central Cascades Wilderness Strategies Project-DRAFT environmental assessment (EA) public comment period included, but were not limited to, the following objections:

- 1) Wilderness Policy
 - a. Failure to serve as the Minimum Regulatory Tool
 - b. Indirect Wilderness management tools not implemented
- 2) NEPA
 - a. Purpose and Need
 - b. Alternatives
 - c. Missing data on usage and impacts

1) Wilderness Policy

We object to the implementation of limited entry day-use permits as proposed in the DN based on the following: under the Forest Service Wilderness Management Policy, Forest managers should Maximize visitor freedom within the wilderness and minimize direct controls and restrictions. Apply controls only when they are essential for protection of the wilderness resource and after indirect measures have failed.¹ We continue to advocate for alternate measures for managing visitor use in these Wilderness areas based on modern recreation ecology principles, site-specific research, and statistically significant data. We support the protection of Wilderness character (of which recreation is a value) and sensitive natural resources; however, we request that a more balanced and tailored management approach to accommodate sustainable recreation opportunities alongside resource protection. Implementing a limited entry day-use permit system could significantly impact access to appropriate recreation in Willamette and Deschutes National Forests.

a. Failure to serve as the Minimum Regulatory Tool

Establishing the minimum amount of regulation that would effectively achieve the desired result for managing an area as Wilderness is a fundamental principle for managing visitor activities in Wilderness. This principle is recognized in Wilderness management practices as the minimum regulatory tool. The DN decision to issue limited entry day-use permits through an online system at numerous trailheads is not the minimum regulatory tool, and will limit climbers' ability to access climbing routes and summit peaks in these Wilderness areas. The DN does not attempt to present data that day-use permits, quotas, and fees are the most effective means to mitigate recreation-caused impacts on Wilderness character.

Recommendations

Based on modern recreation ecology studies and Wilderness Management Policy-2323.12, the Forest Service should implement First Level Action-Public Information and Site Restoration and Second Level Action-Use of Regulations prior to imposing such rigorous Third Level Action-Restrict Number of Users. We propose implementing First and Second Level actions for day-use and overnight areas and trails to further assist in managing impacts to these Wilderness areas. We strongly support management practices,

¹ Forest Service Manual 2300- Recreation, Wilderness, and Related Resource Management Chapter 2320

which allow responsible recreation to co-exist sustainably with natural resource preservation, without imposing undue burden on the general public. We suggest the following First and Second Level actions be taken:

First Level Action- Public Information and Site Restoration:

- De-emphasize attraction of excessively used areas and promote use of alternative areas
- Inform the public of optimum user practices through public service media messages, portal notices, and personal contact. Emphasize ‘no-trace camping’
- Adjust and add administrative and informational signing
- Revegetate damaged areas and post site restoration messages

Second Level Action-Use of Regulations:

- Limit or ban campfires
- Designate campsites
- Require minimum spacing between campsites
- Impose a minimum setback from water and trails for campsites
- Restrict types of use in a specific area or on trails leading to an affected area
- Limit length of stay
- Close re-vegetated campsites
- Install toilet facilities or install wag bag dispensers and require human waste removal to correct major sanitation problems
- Restrict group size

By implementing the above First and Second Level actions, impacts to resources will be reduced as areas are managed appropriately for their use level. In reviewing the overnight use data provided in the EA, it is evident that the majority of resource impacts and management concerns are a result of overnight use exceeding the carrying capacity in these Wilderness areas.

b. Indirect Wilderness management tools not implemented

The Forest Service Policy for Wilderness Management (*Wilderness Management Tools Forest Service Manual 2300- Recreation, Wilderness, and Related Resource Management Chapter 2320-Wilderness Management*) states under 2323.12-Policy:

- 1. Maximize visitor freedom within the Wilderness. Minimize direct controls and restrictions. Apply controls only when they are essential for protection of the wilderness resource and after indirect measures have failed.*
- 2. Use information, interpretation, and education as the primary tools for management of wilderness visitors.*
- 3. Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.*

Access Fund objects to the implementation of limited entry day use fee permits based on the understanding that the Forest Service has not implemented other indirect Wilderness Management Tools

as listed above. Additional education and indirect and direct management tools should be implemented prior to day-use permit enforcement.

Recommendations

- Manage day use by size of parking lot and other indirect measures, but only require day use permits, quotas and fees in exceptional circumstances. The Forest Service should continue to pursue partnerships with County and State officials to address parking issues and enforcement at trailheads. Managing and enforcing parking would self-limit the number of people on trail systems.
- Require permits and quotas for overnight use. In low use areas with concern for dispersal, camping zones are used that permit dispersed camping. When use is concentrated at popular destinations, designated campsites should be implemented. These campsites should be reserved by the specific campsite so that the user knows exactly where they are expected to camp. This reduces competition among users for prime campsites and eliminates proliferation of campsites. Reservation fees are common and lottery systems would be implemented for these sites. Overnight permits would double as parking passes, with spaces reserved for overnight users. The length of stay at designated campsites would be lowered to 3-4 days to allow more users to enjoy the most spectacular parts of their wilderness.
- Maintain, reroute, and construct trails at a high standard to prevent resource impacts despite high levels of use.
- Physically close and restore unwanted social trails and campsites with a combination of user fees and a corresponding increased agency budget.

2) NEPA

Overarching failure to consider available evidence.

In summary, the Forest Service (agency) must comply with NEPA “to *the fullest extent possible*.”² The following components outline the agency’s compliance responsibilities:

NEPA requires the agency to (1) identify accurately the relevant environmental concerns, (2) take a hard look at the problem in preparing its Environmental Assessment, (3) make a convincing case for any finding of no significant impact, and (4) show why, if there is an impact of true significance, there are sufficient changes or safeguards in the project to reduce the impact to a minimum

a. Purpose and Need

A shortcoming of this planning process, analysis, and decision is that it only looked at Visitor Use Management. Site-specific measures such as trail construction, maintenance and rehabilitation, campsite designation, management of roads and trailheads, and area closures were not considered. Limiting the scope of the purpose and need has led to a plan that is unlikely to achieve the purpose of reducing recreation-related impacts to Wilderness. An example of this is designated campsites. They were not considered in the EA, except to remove them because of purported impacts to Wilderness character. In the DN, we find that some have been reinstated because removing the designated campsites would likely

² 42 U.S.C. § 4332. - Cooperation of agencies; reports; availability of information; recommendations; international and national coordination of efforts

cause an increase in resource damage.³ The DN states that an additional NEPA process will be necessary to optimize designated campsite locations. If designated campsites are necessary to achieve the goals of DN, then it should have been considered from the very beginning of the process.

It is unclear in the EA what factors are causing the increase in resource impacts. The EA notes in several places that day use has less impact on Wilderness resources than overnight use. This means that high concentrations of use and spikes in day use are unlikely to be the primary driver of resource degradation. This management plan places a greater regulatory burden on day users.

Recommendation

The purpose and need of this EA should be expanded to fully assess current impact from recreational users in these Wilderness areas and include a plan to address documented environmental impacts rather than focusing only on visitor use management and quota systems.

b. Alternatives

The EA did not consider an alternative without a quota based system to address purported impacts to wilderness. The EA provides inadequate environmental analysis based on the EA's failure to assess current environmental degradation and the absence of data on how quotas will improve environmental outcomes. The EA did not conduct a trailhead-by-trailhead analysis of historical data to determine whether usage has increased at each trail. The DN states that a "*noticeable spike in use has occurred in some locations and high-use travel corridors since 2011, and most notably in 2016.*"⁴ Although the EA lists usage numbers for a few trails, the EA fails to show to what extent usage has increased at each individual trail.

Likewise, the EA does not explain precisely how increased usage has caused trailhead-specific harm. Instead, the EA generalizes on impacts to wilderness without linking those impacts to any specific location or data on usage. For a vast majority of the trailheads that would be impacted by this decision, the Forest Service has failed to demonstrate a need to restrict human access through a quota system. The Forest Service has not demonstrated that a quota system is necessary to protect wilderness values, nor has the Forest Service provided information on environmental harms or resource concerns relating to human access that would warrant a quota.

Recent recreation ecology studies contest historic methods of carrying capacity and visitor use management. Recreation carrying capacity concepts have evolved over several decades from a focus on fixed visitation limits to comprehensive decision-making frameworks focused on sustaining high-quality recreational opportunities. Recreation ecology studies looking at the amount of visitor use related to resource impacts consistently find that use and impact are strongly related only at initial and low levels of visitation, with weak correlations at higher use levels. High levels of resource impacts often occur on established and heavily used trails and recreation sites: reducing use to improve resource condition is generally an ineffective practice. Because of the general asymptotic use/impact relationship and the influence of many other factors, reducing use on a heavily used trail is unlikely to improve trail and surrounding resource conditions. An increasing number of recreation ecology studies describe the efficacy of alternative management strategies, including the design, location, and maintenance of

³ Draft Decision Notice Pg. 10-11

⁴ Draft Decision Notice Pg. 2

sustainable trails and recreation sites. For areas with high visitation, a containment, concentration and education strategy is recommended and has been effectively applied. Many visitor impacts are directly related to human behavior by uneducated visitors who value the places they visit, yet lack the knowledge on proper outdoor ethics and behavior.⁵

Recommendation

An alternative should be added to the analysis reviewing management options outside of a quota based management system. We suggest the including the implementation First and Second Level actions (see above), impacts to resources will be reduced as areas are managed appropriately for their use level. In reviewing the overnight use data provided in the EA, it is evident that the majority of resource impacts and management concerns are a result of overnight use exceeding the carrying capacity in these Wilderness areas. An assessment of purported environmental impacts created by recreational users should have been included in this EA. In addition, environmental assessments should be completed to document current impacts to each trail within the proposed new quota system.

c. Missing data on usage and impacts

Under the DN, day users will have to obtain fee-based permits to access 30 trails during the permit season. Limited entry day-use permits and quotas must be carefully tailored to reflect scientifically collected visitor use data and only require limited entry day-use permits be implemented during times proven by visitor use data to exceed carrying capacity.

The EA and DN state that the Forest Service has collected visitor data at trailheads since 1991. However, the EA and DN purport to rely only on data from a subset of the trailheads impacted for the most recent years. Even that limited data fails to support the broad, sweeping quota system proposed by in the DN. For example, data collected from 2011-2016 at all Three Sisters Trailheads show that at this area's highest level of use in 2016, only 14 days out of the entire data season exceed the proposed quota in the EA.⁶ Neither the EA nor the DN explains why users should pay fees or be subject to quotas when such quotas will have zero impact on usage for the vast majority of dates and locations.

Moreover, the data discussed in the DN relates to many of the most popular or heavily used trailheads in the area like South Sister and Devil's Lake. The quota system, however would also impact numerous other trailheads that are not nearly as popular. There is no basis for assuming that data from a few of the most popular trailheads in the region warrant a quota broadly applicable quota system across Central Oregon wilderness areas. The Forest Service has not conducted an impact analysis on a majority of the trails that will be affected by this plan. NEPA requires the Forest Service to take a "hard look" at available data.⁷ Accordingly, the EA fails to establish a rational connection between the proposed quotas and outcomes sought.

Permit dates were set without studying existing data for June, late September, or years other than 2016. In order to set quotas in the EA, the Forest Service looked at historical usage information from July 1, 2016,

⁵ Marion, J. 2016. A review and synthesis of recreation ecology research supporting carrying capacity and visitor use management decision making. Journal of Forestry. <http://dx.doi.org/10.5849/jof.15-062>

⁶ https://www.fs.usda.gov/nfs/11558/www/nepa/105465_FSPLT3_4290447.pdf. Pg. 39

⁷ 42 U.S.C. § 4332. - Cooperation of agencies; reports; availability of information; recommendations; international and national coordination of efforts

to September 15, 2016.⁸ But this range of studied dates does not align with the proposed quotas. The EA did not analyze usage data prior to July 1, 2016 and the DN proposes quotas that will begin in May. There is no data in the record to justify a quota that would begin prior to July 1. Requiring limited entry day-use permits from May 1st to September 30th will impose undue burden and potentially create social injustice for low-income visitors. Further, quotas will have a disproportionate impact on those seeking to recreate in larger family groups, magnifying the social justice concerns for traditionally underserved communities.

Recommendation

Set quota levels based on available data as well as data yet to be collected for less studied trailheads implicated in this DN. Quotas should be set in a transparent manner by using objective trailhead-specific data and consistent standards. Allow members of the public and advocacy groups to provide review and advice through a formal committee, not only through public comment.

Community Assistance

Deschutes and Willamette National Forest Wilderness areas have a positive impact on local Oregon communities, towns, and cities. Many citizens choose to reside in places such as Bend for the accompanying quality of life, associated health benefits of outdoor recreation, including climbing, hiking, backcountry skiing, trail running, and other human-powered wilderness-based activities. Burdensome and limited entry permit systems could have an unintended economic impact on rural communities, local businesses, and the greater Oregon tourism economy, create unintended social injustice issues, and make local areas a less attractive place to live. Well-managed public lands encourage local citizens to directly help land managers steward these lands and advocate for funding and protection of these public lands, Wilderness areas, and natural resources. Unreasonable restrictions on recreational use further propagates a population of citizens that under-appreciates these outdoor places. We encourage the Forest Service to partner with Access Fund and other local recreational access groups – including those representing traditionally underserved communities, to collaborate on alternative management actions to protect the resource and allow recreational access to these Wilderness areas.

Access Fund, the American Alpine Club, the Mazamas, Leavenworth Mountain Association, and the local climbing community are ready, willing, and able to help the Forest Service improve trails, facilities, signage and other management needs. Local climbing communities throughout Oregon have a long history of positive environmental stewardship and collaboration with government agencies, private landowners, and other organizations to protect highly-valued climbing resources in Oregon. Access Fund strives to work with local climbers and land managers to address those needs. We also provide training on planning and stewardship best practices to keep those areas healthy. At a national and local level, Access Fund continues to advocate for greater funding of federal land agencies towards education, enforcement, and stewardship, which can reduce recreational user impacts on Wilderness characteristics.

⁸ Central Cascades Wilderness Management Strategies Project DRAFT, pg 138

Access Fund

Access Fund is the national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 17,000 members and over 117 local affiliates. Access Fund holds a national level Memorandum of Understanding with the Forest Service. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

The Mazamas

The Mazamas, a nonprofit mountaineering organization, was formed on the summit of Mt. Hood in 1894. Our mission is to promote mountaineering through education, climbing, hiking, fellowship, safety and the protection of the environment.

The American Alpine Club

The American Alpine Club is a community of over 20,000 members united to support our shared passion for climbing and respect for the places we climb.

Leavenworth Mountain Association

Leavenworth Mountain Association is a climbing advocacy and stewardship 501(c)(3) non-profit organization and Local Climbing Organization with the Access Fund. Our mission is to strengthen the community through climbing.



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