



Protect America's Climbing

July 3, 2017

Deschutes National Forest
Attn: Beth Peer
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Bend, OR
97701

Submitted via Email: bpeer@fs.fed.us & comments-pacificnorthwest-deschutes@fs.fed.us

RE: Deschutes and Willamette National Forest Wilderness Management-Central Cascades Wilderness Strategies 2017

Access Fund appreciates the opportunity to comment on the Central Cascades Wilderness Strategies 2017 scoping phase, in consideration of visitor use management strategies for five wilderness areas in the central Cascades to reduce resource impacts caused by increased recreational use. The proposal to require permits for overnight and day use hikers in five wilderness areas, Mt. Jefferson, Mt. Washington, Three Sisters, Waldo Lake and Diamond Peak, is intended to manage impacts from visitor use. There are several important rock climbing and mountaineering opportunities in these Wilderness areas. Access Fund recognizes the importance of managing visitor impacts to protect Wilderness character and natural resources, however we do not support the implementation of day use fees and permits, which will greatly impact climbing access to some of these Wilderness areas. We would like to work with the Deschutes and Willamette National Forest to address day use impacts by recreational users including climbers.

Access Fund

Access Fund is a 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 15,000 members and over 100 local affiliates. Access Fund holds a national level Memorandum of Understanding with the Forest Service¹. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

¹ See <https://www.accessfund.org/uploads/Access-Fund-USFS-MOU-2014.pdf>

COMMENTS

Mt. Jefferson, Mt. Washington, and Three Sisters Wilderness areas hold iconic rock climbing and mountaineering opportunities. The proposal to require permits for overnight and day use hikers in five wilderness areas, Mt. Jefferson, Mt. Washington, Three Sisters, Waldo Lake and Diamond Peak, is intended to manage impacts from visitor use, however it will impose significant burden and restrictions on recreational access to these areas.

We understand that the Forest Service has a great responsibility under the law to protect and manage Wilderness areas for the preservation of its characteristics. We also recognize the public pressure on the agency to get more people outside. We applaud your efforts to balance these responsibilities. It is difficult to strike a balance between the demand for Wilderness recreation and long-term resource protection. The current proposal to charge fees and implement a permit system will limit recreationist ability to access these Wilderness areas and create a financial and administrative burden, especially for low income, underserved communities. Access Fund recognizes the increase in visitor use in these areas since 2011, and respects the Forest Service's effort to manage user impacts and preserve the Wilderness setting². We recommend the Forest Service implement **MA-1-30 First Level Action-Public Information and Site Restoration and Second Level Action-Use** of regulation prior to imposing **Third Level Action-Restrict Number of Users**³.

Traditionally commercial use and overnight permits are implemented in areas of high use within the National Forest to manage visitor impacts to Wilderness areas. Requiring day use visitors to obtain and pay for permits will impose undue burden and potentially create social injustice for low income visitors. Under the Standards and Guidelines for Management Area 1, MA-1-02: *'Wilderness shall be made available for maximum public recreation use and enjoyment, consistent with resource preservation and maintenance of the Wilderness environment.'*⁴

We generally support the protection of Wilderness character and sensitive natural resources; however, we recommend a more balanced management approach that can accommodate sustainable recreation opportunities alongside resource protection be implemented. While we advocate for the climbing community specifically, we generally support most forms of responsible human-powered recreation, and this proposed regulation could significantly impact access to appropriate recreation in Willamette and Deschutes National Forests. The climbing community would like to work with Forest Service to establish sustainable access to climbing opportunities in these Wilderness areas, without the implementation of day use permits and fees.

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http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/105465_FS_PLT3_3992851.pdf

³ Ibid.

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http://a123.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/105465_FS_PLT3_3991425.pdf

Recommendations

Access Fund proposes implementing First and Second Level actions⁵ for day use and overnight areas and trails, instead of implementing fee and permit structures for day use visitors in the five Wilderness areas. We strongly support management practices 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 prior to implementing Third Level Action-Restrict Number of Users.

First Level Action- Public Information and Site Restoration:

The following sequence of actions should be used in most cases:

- 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' (Leave No Trace ethics).
- Adjust 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 revegetated campsites.
- Install toilet facilities (or install wag bag dispensers and require human waste removal to correct major sanitation problems).
- Restrict group size, (but allow reasonable implementation of facilitated access, especially for organizations that educate their user group to 'leave no trace' and provide access for poor, underserved communities).

By implementing the above First and Second Level actions, impacts to resources will be reduced and areas managed appropriately for their use level. In some cases overnight permits may be appropriate, however we request user capacity studies be conducted to estimate maximum capacity levels and overnight permit numbers suitable to preserve Wilderness character and resource protection. The requirement of day use permits is not an appropriate management action, the implementation of fees and permits for day use to manage impacts to an area puts an undue burden on the recreational user and in some cases may create a social injustice issue by placing financial burden on low income user groups. Facilitated access, especially for

5

organizations that educate leave no trace ethics among their user group and provide access for such underserved communities should not be encumbered. In addition, new fees require approval by a Resource Advisory Council or Region 6 Recreation Resource Advisory Committee. We encourage the Forest Service to partner with the Access Fund and other recreational access groups to collaborate on alternative management actions to protect the resource and allow recreational access to these Wilderness areas.

Access Fund Assistance

The climbing community and the Access Fund 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 at all levels of government, private land owners and other organizations to protect highly-valued climbing resources in Oregon. 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. In addition, some aspects of this planning initiative as well as stewardship improvements, human waste management, and user education may qualify for the Access Fund Climbing Preservation Grant Program⁶ or assistance from our Conservation Team⁷ which helps maintain climbing areas throughout the United States.

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⁶ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

⁷ http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Thank you for your consideration of these comments on the proposal to require permits for overnight and day use hikers in five wilderness areas, Mt. Jefferson, Mt. Washington, Three Sisters, Waldo Lake and Diamond Peak. The Access Fund has the experience, local contacts, and resources to help planners craft alternatives that encourage climbing while sustaining the health and integrity of the National Forest. The Access Fund looks forward to continuing to work with Willamette and Deschutes National Forest. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (425-218-8234) or email (joe@accessfund.org) to discuss this matter further.

Best Regards,

A handwritten signature in black ink, appearing to read 'Joe Sambataro', with a long horizontal flourish extending to the right.

Joe Sambataro
Northwest Regional Director
Access Fund

Cc: Brady Robinson, Access Fund, Executive Director
Erik Murdock, Access Fund, Policy Director