

HOOD/WILLAMETTE RESOURCE ADVISORY COMMITTEE

P.L. 106-393; SECURE RURAL SCHOOLS AND COMMUNITY SELF-DETERMINATION ACT OF 2000

December 12, 2022, 9:00am

Meeting Minutes

(page 2, section 1.b. updated on 1/31/23)

*Meeting held virtually via Microsoft Teams and in person at
Keizer Community Center, 930 Chemawa Road Northeast, Keizer, Oregon, 97303*

HOOD-WILLAMETTE RAC MEMBERS PRESENT: Will Tucker, Patrick Davis, Steve Wilent, Neila Whitney, Jeff Jaqua, Kevin Cameron, Jeff Parker, Melanie Kate-Mason, Alyssa Brownlee, Rick Ragan, and Mary Grace Brogdon.

US FOREST SERVICE STAFF PRESENT: Jennifer Sorensen (RAC Coordinator), David Warnack (DFO), Meta Loftsgaarden, Stan Hinatsu, Clair Fernandez, Ryan Matz, Andrea Durham, Leslie Garcia, Lilith Milam, Sandra Gibbons, Todd Harbin, Amanda Loye, Liza Honorio, Christy Cheyne, Emily Long, and Steven Beri

COMMENTING PUBLIC: Matt Mioduszewski, Andrew Traylor, and Kathrin Dragich. Additional members of the public were present both in person and online to observe.

ACRONYMS:

CRGNSA: Columbia River Gorge National Scenic Area

DFO: Designated Federal Official

FLREA: Federal Lands Recreation Enhancement Act

FY: Fiscal Year

MHNF: Mt Hood National Forest

OHV: Off Highway Vehicle

OGC: Office of Government Counsel

RAC: Resource Advisory Council

SRS: Secure Rural Schools

USFS: United States Forest Service

WNF: Willamette National Forest

Q: Question

A: Answer

ATTACHMENTS:

Appendix A-C: Public comments received for the 12/12/2022 RAC meeting.

Appendix D: Presentation slide deck "*Resource Advisory Committee: Understanding the Federal Lands Recreation Enhancement Act*"

Appendix E: Presentation slide deck "*Mt Hood National Forest Recreation Fee Proposal Public Outreach 2022*"

Appendix F: Presentation slide deck "*Columbia River Gorge National Scenic Area Recreation Fee Proposal – 2022*"

Appendix G: Mt Hood Fee Proposal Briefing (provided as part of agenda packet in advance of meeting)

Appendix H: Mt Hood Special Recreation Permit Fee Management Plan (provided as part of agenda packet in advance of meeting)

Appendix I: Columbia River Gorge Fee Proposal Briefing (provided as part of agenda packet in advance of meeting)

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MEETING PURPOSE: Purpose of meeting is to (1) discuss and hear RAC recommendations on a suite of recreation fee proposals from the MHNH and CRGNSA and (2) to share updates on RAC member recruitment, upcoming title II funding, and tentative plans to convene the committee in 2023.

PUBLIC COMMENTS:

1. Public comments were heard from Matt Mioduszewski (oral and written), Andrew Traylor (oral and written), and Kathrin Dragich (written only). See appendix A for comments.

OVERVIEW OF USFS FEE PROGRAMS:

1. Review presentation: Overview of agency recreation fee programs, governing legislation, purpose of RAC review. See appendix D for slide deck.
 - a. Q: Is there intent to establish a recreation RAC to handle fee recommendations in Region 6? A: Yes, and work is underway on this, however until one is established a BLM or SRS RAC can be used to meet fee proposal review and recommendation needs.
 - b. Q: Has this use of alternate RACs been reviewed by legal counsel? A: **Yes, the USFS relies on OGC for legal review. The FLREA legislation and the SRS charter explicitly refer to this allowable use, and counsel has reviewed and authorized this use (meeting notes updated on 1/31/23 to correctly refer to OGC and FLREA legislation).** In other regions, Bureau of Land Management and SRS RACs are used exclusively for this purpose, or governors have exercised exceptions allowing fee proposals to move forward without RAC engagement. SRS RACS still represent a wide range of interests and experiences, including many directly related to recreation. The DFO will be reaffirming his understanding of this.
 - c. Q: Can fees proposed under FLREA expire? A: A forest has discretion to stop charging a fee on a temporary basis (for example if inclement weather results in changes to amenities), but to remove a fee entirely RAC consideration and recommendation is required.

OVERVIEW OF MT HOOD FEE PROPOSAL:

1. Review presentation: Overview of Mt Hood Fee Proposal. See appendix E for slide deck.
 - a. Q: Regarding the proposed yurt fee, how did you reach \$100/night? Is there market research to back this up? A: Yes, market research took into consideration similar offerings on other units and popularity of the site. Additionally, the fee for Trillium is higher because the site accommodates more people. It is proportional to capacity.
 - b. Guiding policy for fee setting requires fees be based on market price, not on fee recovery. The closer sites are to urban areas, typically the more popular they are. Increased demand lends itself to higher fees.
 - c. The proposed fees do not apply to concessionaire operated sites. Some sites may have been concessionaire run in the past, or only concessionaire run during part of the year. USFS will address website errors regarding which sites are concessionaire run verses not.
 - d. Regarding the climbing permit proposal, setting the annual rate at \$100 then dropping it to \$50 was based on surveying feedback from focused outreach and public feedback. Staff met with several focus groups and heard that \$50 was more reasonable than \$100. Engaging the public is a part of market research.
 - e. Q: Is predicted revenue based on the assumption that all users will comply with the fee? Is there adequate staffing and/or options to ticket for non-compliance? A: It is based on their

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- best estimate regarding level of compliance. Not all sites are always at capacity (many experience seasonal use), and not all sites have staff on site consistently. Compliance work is focused on achieving compliance, not ticketing; compliance can often be achieved by staff even if they are not Forest Protection Officers (able to issue tickets).
- f. Q: will new fee sites be reserved through recreation.gov? A: Yes, some will require reservations in advance, while others will be first come first serve.
 - g. Q: What is meant by the need for “general public support” to approve a new or increased recreation fee? A: The phrase “general public support” is very ambiguous in the law. As part of assessing this, the agency asks itself, given the complexity of the proposal, did the forest do a good job of engaging the public to assess support? We (the regional office) feel they did and feel there is general support. Gaining public support is more difficult when you are starting with no fee. The climbing permit is a complex issue, more complex than the other proposals. The proposed fee sites are currently unsustainable, and therefore need fees to maintain them. In many cases concessionaires are not interested in running the sites because they are not financially sustainable.
 - h. The three OHV sites were originally proposed as new fee sites however they were dropped after significant coordination with OHV volunteer groups who have stepped up to help better manage these sites.
 - i. Many years ago, there was discussion of developing a Climbing Ranger program. In the last 5-6 years there has been a large increase in in people summiting Mt. Hood. Some are doing this safely and appropriately, others not. The forest has engaged in lots of discussion with partners acknowledging and discussing how to best manage this shift. Climbing Rangers are not and should not be serving as search and rescue. The goal of this fee program is not to make everyone safe, but rather to improve understanding of how to approach this safely.
 - j. Q: Were capacity limits considered as part of this proposal? A: Capacity tracking information was not available; therefore, no capacity limits were proposed.
 - k. Q: How will people pay these new fees? How will this all be implemented? A: For the campgrounds there will not be a reservation system, rather there will be ion site fee tubes. The website should clearly identify these as not available to reserve via recreation.gov. Additionally, as part of initial implementation any new fees will be noticed thoroughly to the public through a Federal Register Notice, press releases and other public affairs tools.
 - l. There is an ongoing problem of people using specialized campgrounds/sites for general camping, for example horse camps being used by non-stock users. There is a recognized lack of enforcement on this issue.
 - m. Q: By implementing fee programs, is more work being created that will also lack capacity to meet? A: the collected fees will help to fund seasonals to help with implementation of these fees. At this point the MHNH expects to be fully staffed in terms of seasonal support. They have already moved to develop the climbing ranger position, so they are ready to go once funding becomes available. Additional staffing reduces other non-compliance issues which helps the overall balance of meeting needs.
 - n. Q: Is there actual staffing capacity to meet these needs? What about staff retention, housing, low wages, etc.? A: This is a known issue. It was recently addressed through legislation for the firefighting community, staff is hopeful something similar is on the horizon for recreation

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- providers. There is no easy/known solution for this. With new fees come higher expectations as well.
- o. Q: Has there been any consideration that by dropping the OHV fee proposals the forest may appear to be endorsing that type of recreation? A: OHV is largely funded through state grant programs, the funding originates from the state stickers that must be purchased by users annually. The original intent was these would be Northwest Forest Pass Sites, however since users are already paying for annual stickers it would be very important to ensure there was not double dipping between these funding sources. The accounting necessary to keep these separate was another good reason to drop these 3 proposals.
 - p. Q: Agency partners are being told over and over that the agency is experiencing a windfall of funding driven by recent legislation. Some would say its so much that there are concerns about implementing and spending it all. Help us understand how these funding sources wouldn't be able to address the deferred maintenance needs at these sites? A: The "color of money" creates challenges- the Inflation Reduction Act and Bipartisan Infrastructure Law are both leading to significant funding for much needed work, however each has a specific intended use, and the needs don't always align with this use. Some types of funding (for example Great American Outdoors Act funding) are awarded competitively and require applications and are therefore far from guaranteed. Deferred maintenance is not the same as regular routine maintenance. Recreation fee money can fund site operations.
 - q. Q: What considerations have you made of equity concerns raised when fees are in place? A: In some cases, fees are the last barrier in a long line of barriers to accessing recreation resources. All users are different in terms of what presents a barrier. Climbing specifically is already an expensive hobby, and it begs the question as to whether this fee would price anyone out. Additionally, the agency offers several opportunities for users to access these resources for free- there are several fee free days each year, there are free pass options including Every Kid Outdoors passes for 4th graders, etc. That said, the MHNH is looking at every opportunity to improve access to climbing and to help ensure access at no cost when needed. One such plan is to make passes available through partner organizations. Ultimately, if a fee is not implemented, then how are these sites sustained? Its possible that the alternative is the sites are decommissioned with is unpopular.
 - r. Q: will the proposed fees drive use to other non-fee sites, including dispersed sites? If so, can fees be used to maintain other non-fee and dispersed sites? A: No, the fees collected at each site can only be used at that site. Implementing fees does not always result in pushing use to other sites. Additionally, creating fee revenue for one site frees up appropriated dollars which could be used at other non-fee sites.
 - s. Fees would not be charged until all promised amenities are in place.
 - t. Q: What happens if a climbing pass is purchased in advance and then the weather turns? A: There will be lots of flexibility on when/where to buy passes. Marketing will encourage purchasing of passes just before intended climb to avoid poor conditions.
 - u. Entering the wilderness is the carrot. The solution to these problems should be framed with wilderness in mind.
 - v. The forest should invest in monitoring and be willing to adjust as things are learned. Consider a monitoring committee.

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- w. Covid 19 has impacted public engagement. Climbing Rangers can be invaluable in terms of connecting with users. Invest in this.
 - x. FLREA fee money is sometimes saved for multiple years to fund larger projects. As such, tracking its use is not always easy or transparent to interested parties.
 - y. Regarding the funding proposed to be invested into climbing partner groups- the agency should be careful to not professionalize volunteers. Keep roles and responsibilities of volunteer groups distinct from professional Search and Rescue operations. If the forest stands up a monitoring group to help with adaptive management of this program, they could help inform how these partner funds are best invested. The intent of these funds would be a nod to recognize the importance of those partnerships in overall program. The intention is to maintain strong, adaptive working relationships, specifics on how the funding is used is to be determined collaboratively.
 - z. The monitoring panel should have 3 foci: vetting merits of 2 versus 3-day pass, informing timing of staff (i.e., 9-5 is not appropriate), and identifying infrastructure needs.
2. Recommendations were made as follows:
- a. Proposal to add fees to 9 Day Use Area Sites (includes 7 trailheads and 2 picnic sites):
 - i. Category A members: 3 in favor, 0 against
 - ii. Category B members: 1 in favor, 3 against
 - iii. Category C members: 2 in favor, 2 against
 - iv. **Proposal NOT recommended for implementation.**
 - b. Proposal to add fees to 10 Campground Sites:
 - i. **Vote was unanimous: recommend implementation as proposed.**
 - c. Proposal to add fees to 2 lookouts and 1 yurt site:
 - i. **Vote was unanimous: recommend implementation as proposed.**
 - d. Proposal to add fees to 2 lookouts and 1 yurt site:
 - i. **Vote was unanimous: recommend implementation as proposed.**
 - e. Proposal to implement Mt Hood Climbing Program including Special Recreation Permit and associated permit fees for 2 day permits and annual permits as proposed, with the addition of establishing a monitoring group to assess and provide feedback on implementation of the climbing program, fees, and operations, as well as advise on best use of partner support funding:
 - i. Category A members: 3 in favor, 0 against
 - ii. Category B members: 4 in favor, 0 against
 - iii. Category C members: 3 in favor, 1 against
 - iv. **Recommended for implementation as described above.**

OVERVIEW OF CRGNSA FEE PROPOSAL:

- 1. Review presentation: Overview of CRGNSA Fee Proposal. See appendix F for slide deck.
 - a. Q: It's a big problem to pay a fee but then not be able to locate a parking spot. How is this being addressed? A: This is a huge jurisdictional issue and there is no easy solution, however each agency is working together to try and determine a solution.
 - b. Q: How is success defined? A: the contractor working on this project created a suite of metrics including impacts to traffic, parking lot capacity, public feedback, emergency medical

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- services response time, etc. Though issues still exist there has been measurable improvement. On the flip side there are no metrics on those who came and left without successfully locating a spot to park.
- c. There has not been a way to track pass through visitors verses those who seek this as their destination.
 - d. There is a timed entry system, but no limit on how long someone stays. The length of stay can vary dramatically, though 1 hours is the assumed length of stay for planning purposes. Implementing a time limit would be difficult given that some people park with the intention of longer hikes. Consider offering multiple passes based on intended use.
 - e. Q: How many staff permit checkers are needed? A: Not enough! This is a tough need to meet, however it is being addressed in part through partnerships with other organizations and responsible parties.
 - f. Proposal to add fees to timed use permit at Multnomah Falls and Waterfall Corridor:
 - i. **Vote was unanimous: recommend implementation as proposed.**

HOOD-WILLAMETTE RAC COMMITTEE BUSINESS:

1. Update on new member recruitment and appointment:
 - a. Very successful outreach and recruitment period throughout summer of 2022- resulted in 21 applicants for 11 upcoming vacancies. Nomination package was submitted in September and included a full slate of candidates and alternates necessary to fully staff the RAC in the coming years. Nomination package is currently in process and working its way through the national and agency processes. Hopeful that we may have new members appointed early in 2023.
2. Upcoming Title II funding opportunities and tentative meeting expectations for next year:
 - a. The Infrastructure Investment & Jobs Act included a 3-year extension to the SRS Act and improvements to nomination package approval processes. This extension results in 3 years of title II funding available for new and/or past recommended projects.
 - b. If new RAC members are appointed early in 2023, we will consider opening a new title II proposal solicitation in early spring and convening the RAC to make funding recommendations before summer. If not spring of 2023, we would look to Fall 2023 instead and bundle 2 years of title II funds into one solicitation effort.
3. Recognizing RAC members for their service: Several of the current RAC members are set to term out on 12/21/22. Brief recognition and thanks for their service to public lands.

NEXT STEPS:

1. RAC Coordinator will prepare the recommendation packages for DFO consideration and approval. Meeting notes will be posted too the H-W RAC Website.
2. Upon DFO approval, RAC Coordinator will prepare necessary information for the recreation fee proposal teams on the MHNf and CRNSA.
3. RAC Coordinator will work to coordinate a field site visit to some previously awarded Title II projects in the upcoming year.

ADJOURN: 2:37pm.

APPENDIX A: Public comments received for the 12/12/2022 Hood-Willamette RAC Meeting from Matt Mioduszewski

DIRECT COMMENTS TO THE HOOD-WILLAMETTE RESOURCE ADVISORY COMMITTEE REGARDING PROPOSED FEES IN MOUNT HOOD NATIONAL FOREST

Federal Register Doc# 2022-19184 (<https://www.govinfo.gov/content/pkg/FR-2022-09-06/pdf/2022-19184.pdf>)

Comments from Matt Mioduszewski

Outline

- 1) Inappropriate use of the Hood-Willamette SRS RAC to address Federal Lands Recreation Enhancement Act (FLREA) fee proposals
 - 2) Regarding the Special Recreation Permit proposal for climbing Mt. Hood
 - 3) Regarding mentioned increase in Security
 - 4) Regarding new fee sites, Mt. Hood National Forest
 - 5) Regarding an increase in Lookout Tower Fees
 - 6) Regarding Equity and Accessibility to Permits, Public Land Amenities
 - 7) Regarding dropping of OHV fees despite no specific opposition in comments provided
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1 - Use of SRS Resource Advisory Committee in lieu of FLREA directed Recreational Resource Advisory Committee

The fee proposals which the Forest Service is asking the Hood-Willamette SRS RAC to approve derive their fee collection authority from the Federal Lands Recreational Enhancement Act.

(<https://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter87&edition=prelim>)

Under §6803. Public participation, section (d) Recreation Resource Advisory Committee there are 12 sub-headings regarding a Recreational Resource Advisory Committee, including the Establishment of it, Duties, Meetings, **Composition of the Committee**, Term, Chairperson, Quorum, **Approval Procedures**, and Compensation.

The specific section in question is shown below, under d(1)(D) User of other Entities

§6803. Public participation

(d) Recreation Resource Advisory Committee

(1) Establishment

(A) Authority to establish

Except as provided in subparagraphs (C) and (D), the Secretary or the Secretaries shall establish a Recreation Resource Advisory Committee in each State or region for Federal recreational lands

and waters managed by the Forest Service or the Bureau of Land Management to perform the duties described in paragraph (2).

(B) Number of Committees

The Secretary may have as many additional Recreation Resource Advisory Committees in a State or region as the Secretary considers necessary for the effective operation of this chapter.

(C) Exception

The Secretary shall not establish a Recreation Resource Advisory Committee in a State if the Secretary determines, in consultation with the Governor of the State, that sufficient interest does not exist to ensure that participation on the Committee is balanced in terms of the points of view represented and the functions to be performed.

(D) Use of other entities

In lieu of establishing a Recreation Resource Advisory Committee under subparagraph (A), the Secretary may use a Resource Advisory Committee established pursuant to another provision of law and in accordance with that law or a recreation fee advisory board otherwise established by the Secretary to perform the duties specified in paragraph (2).

This is just one of the 12 sections under the parent of Recreation Resource Advisory Committee. Each of those other sections specifically mention **Recreational** RAC. It is only provision (D) above that says In lieu of establishing a Recreational RAC that another RAC may be used. However provision (A) says that the Secretary **SHALL** establish a Recreational RAC, except for the two 'exception' provisions.

The National Forest uses a Resource RAC for Eastern States, Southern States, and the Pacific Southwest (CA). <https://www.fs.usda.gov/visit/passes-permits/recreation-resource-advisory-committees>

Rocky Mountain, Intermountain, and SW region uses BLM RACs which are described by the BLM as "Sounding boards for BLM initiatives, regulatory proposals and policy changes"

The Pacific Northwest is unique in choosing to have SRS RACs fulfill the duties of FLREA fee proposals. This, despite the previous formation of a Pacific Northwest Recreational RAC which appears to have last convened on February 2nd, 2010. (https://www.fs.usda.gov/detail/r6/recreation/racs/?cid=fsbdev2_026883)

There is a public request for a Recreational RAC in news releases in 2018 but the Forest Service has never provided a rationale for why a Recreational RAC does not exist in Oregon or Washington, or for the Pacific Northwest.

FLREA specifies the composition of a Recreational RAC to be:

(5) Composition of the Advisory Committee

(D) Broad and balanced representation

In appointing the members of a Recreation Resource Advisory Committee, the Secretary shall provide for a balanced and broad representation from the recreation community that shall include the following:

- (i) Five persons who represent recreation users and that include, as appropriate, persons representing the following:
 - (I) Winter motorized recreation, such as snowmobiling.
 - (II) Winter non-motorized recreation, such as snowshoeing, cross country and down hill skiing, and snowboarding.
 - (III) Summer motorized recreation, such as motorcycles, boaters, and off-highway vehicles.

- (IV) Summer nonmotorized recreation, such as backpacking, horseback riding, mountain biking, canoeing, and rafting.
- (V) Hunting and fishing.

(ii) Three persons who represent interest groups that include, as appropriate, the following:

- (I) Motorized outfitters and guides.
- (II) Non-motorized outfitters and guides.
- (III) Local environmental groups.

(iii) Three persons, as follows:

- (I) State tourism official to represent the State.
- (II) A person who represents affected Indian tribes.
- (III) A person who represents affected local government interests.

This is not the same as the SRS member composition.

Additionally FLREA says for Recreational RACS:

(9) Approval procedures

A Recreation Resource Advisory Committee shall establish procedures for making recommendations to the Secretary. A recommendation may be submitted to the Secretary only if the recommendation is approved by a majority of the members of the Committee from each of the categories specified in paragraph (5)(D) and **general public support for the recommendation is documented.**

The Forest Service is bypassing this congressionally approved legislation requirements, by having an SRS board provide this same assessment, exempting from the bulk of the specifics for a Recreational RAC, including the above requirement that there is general public support for the recommendations.

The Forest Service does not seem to have provided you, the Hood-Willamette RAC with any assessment about general public support or opposition to their fee proposals. Why is the Forest Service by-passing this requirement of FLREA?

§6802. Recreation fee authority

(a) *Authority of Secretary*

(b) *Basis for recreation fees*

Recreation fees shall be established in a manner consistent with the following criteria:

- (5) The Secretary shall obtain input from the appropriate Recreation Resource Advisory Committee, as provided in section 6803(d) of this title.

Is the Hood-Willamette SRS the appropriate **Recreation Resource Advisory Committee**? Or is the FS by-passing FLREA's requirements and having a group that exists for SRS Title II Project recommendations masquerade as something else, simply because it is expedient for the Forest Service to achieve their ends?

Which brings us to the SRS RAC Charter. The National Charter Specifies what an SRS RAC is supposed to address <https://www.fs.usda.gov/pts/>

Objectives and Scope of Activities

The purpose of each RAC is to improve collaborative relationships among the people that use and care for the National Forests and to provide advice and recommendations to the Forest Service concerning projects and funding consistent with Title II of the Act.

Description of Duties Each RAC shall be solely advisory in nature. Advice or recommendations of the RAC shall be given only with respect to the purposes of the committee as defined in the Act.

In both these cases ‘the Act’ is in reference to the Secure Rural Schools and Community Self Determination Act of 2000 (the Act), 16 U.S.C. sec. 7125, as amended, most recently by the Agricultural Improvement Act of 2018 (P. Law 115-334)

Despite the charter subsequently shoe-horning in that the Designated Federal Officer **in addition to regular duties** (and in the implication that these are irregular duties) make recommendations regarding FLREA fee authority matters (without referencing FLREA), Both the Objective and Scope and Description of Duties reference SRS Act and Agricultural Improvement Act of 2018, and neither of these pieces of legislation mention fee authority or fee proposals for recreational use of public lands.

To that end I do not believe the Forest Service is acting in the spirit of FLREA by having the Hood-Willamette SRS RAC decide FLREA Matters.

Specifically, SRS RACs exist to provide guidance and recommendation on Title II projects in member’s respective areas, the same way a Recreational RAC exists to provide guidance and recommendations on FLREA fee proposals.

On the FACA (Federal Advisory Committee Act) Database the Hood-Willamette

Why advice can't be obtained elsewhere?*

The RAC is necessary to improve collaborative relationships among the people that use and care for the National Forests and to provide advice and recommendations to the Forest Service concerning projects and funding consistent with Title II of the Act.

You will notice it doesn't say “consistent with Title II of the Act **and FLREA duties**”

I fail to see where in the Act, you are given permission to address the establishment or modification recreational fee proposals.

I am also failing to see how the composition of an SRS board including School officials or Teachers, Federal Grazing Permit holders or land use permit holders, or non-industrial private land owners, commercial timber interests, and Archeology and History members correlate to Fee Proposals for Recreation. With all due respect to these SRS Members and their committee services, it is hard to understand how Linn and Marion Counties are affected for instance when none of the fee proposals mentioned are happening in these counties.

It should be of note that the SRS RAC's agenda for 12/12/2022 consists of approximately 25 allotted minutes to SRS Title II project discussion out of a 6 hour agenda and 2 hours to discuss FLREA related fee matters.

Also noted is that there was supposed to be 2 SRS RAC meetings, one in November to review these items and a subsequent one (12/12/2022) to answer additional questions and make a recommendation.

Why the FS was not able to accommodate this is unknown. Instead significant policy, fee, and public impact changes are being asked to be implemented on the same day. It is hard to expect that every RAC member will be able to process the limited oral comments and additional public comments submitted in the short window between when the RAC report was made available and when this meeting is occurring.

I would highly recommend the RAC at a minimum, postpone until a further date, making any decisions regarding the Mt. Hood National Forest Fee Proposals, including the Mt. Hood Special Recreation Permit for climbing.

2 – Mt. Hood Special Recreation Climbing Permit

There are numerous issues with this proposal. Primarily, the public was not able to view the Special Recreation Climbing Permit Business/Fee Management Plan before submitting comments. If this information was not created before soliciting comments from the public, it seems this was a pre-ordained idea that the Forest Service expects to be implemented regardless of details. If this existed prior to the public comment period, why did the Forest Service conceal this information from the public?

Thus the public could only comment on the program platitudes and generic overview, not any substantial critique of the program or specifics of its implementation.

The Mt. Hood Climbing Program Fee Management Plan states that:

Special Recreation Permits are issued as a means of ensuring the protection of natural and cultural resources, providing for the health and safety of visitors, providing visitor services, and helping cover the higher costs of providing these specialized recreation opportunities

The website about the proposal states:

Mt. Hood's popularity as a climbing destination has resulted in public health and safety issues, including technical search and rescue operations, human waste in sensitive ecosystems, and parking issues at trailheads. The Mt. Hood climbing program needs financial support to help manage and address these issues.

The Fee Management Plan mentions an increase in overall use of the Forest and says the Hood River Sheriff's office has responded to 28 high elevation SAR incidents in 9 years. That's 3 per year. Is this dramatically higher than in the 1990's or early 2000s? Why is Hood River Sheriff only mentioned? It mentions that 31% (less than 1/3rd) of PMR's calls have been for climbers on the upper elevations on Mt.

Hood. Based on this it sounds like there should be more permitting for lower elevation endeavors if a majority do not happen at high elevations.

Beyond this the Forest Service has not provided one scintilla of statistical, quantifiable data that demonstrates climbing accidents, fatalities, or rescues have increased to numbers higher than in the past.

The Forest Service mentions negative natural resource and visitor experiences in the area and that maintaining wilderness character is a legal requirement. Yet this wilderness area is regularly polluted by Snow-Cat operation right up to its boundary, with light, sound, and diesel exhaust pollution. Does the FS think this is not a negative visitor experience when in a Wilderness? How do they prevent this from affecting the wilderness character?

To this end, the Forest Service has supplied no statistical, quantifiable, measured data which demonstrates user experience has degraded, that natural resources are being damaged. This would include something like water quality tests which can be directly attributed to mountain climber waste. Or the environmental impact in terms of habitat destruction, flora or fauna reduction of use, behavior, or injury/death.

As part of the plan the Forest Service does not provide any baseline metrics on usage, accidents, or environmental impact. Nor does the Forest Service Fee Plan have any mention of how a permit will measurably affect these issues, and by what methodology they plan to demonstrate to the public with statistically data, that the Climbing Ranger program has yielded an improvement from baseline conditions.

From a safety perspective, the Forest Service suggests that permits will alleviate the above issues and make the mountain safer. Yet no evidence is provided that permits have improved accident rates, accident response times, or reduced fatalities. Accidents regularly occur on Mt. St. Helens, Mt. Adams, and Mt. Rainier. If the FS proposes the Climbing Ranger program will address safety, where is the statistical information that permits will achieve this? There already is a lot of publicly available information regarding climbing conditions, safety recommendations, and general route descriptions (social media, local climbing clubs). There is already information in the kiosk area at the Day Lodge.

Additionally from a safety perspective, the Forest Service states they will be on the climb route from 9am-5pm per their comments to the public "rangers would not be working outside of 9am to 5pm normal hours for "work life balance""

How does the FS propose these additional rangers will achieve their efforts when they are not working during the predominate times of day that climbers are active on the mountain?

Additionally during public meetings, the MHN stated in the public meeting that rangers would never tell climbers to continue with their ascent or to descend, regardless of the conditions.

How does the Forest Service reconcile that having more climbing rangers will improve safety if climbing rangers are not doing anything direct to alter the choices of climbers?

Finally, I believe a bad-faith effort was made as it relates to proposed fee of \$100 for an annual pass then dropping it to \$50. The FS tells the public that

“Proposed fee prices are based on a market analysis of similar sorts of opportunities within Oregon and Washington”

Yet at a public meeting a FS personnel said “part of the reason we’ve proposed \$100 is to kind of see what public reaction is to that” – so was this made based on market analysis? Because there is no evidence the FS performed such market analysis. If they had they would have something to support that number. For anyone in the active PNW climbing community it takes all of a few minutes to know the costs to climb any of the fee volcanoes and none of them are above \$53. I hate to be cynical but it appears the FS intentionally proposed a high number with the knowledge they would reduce it to have evidence they ‘listened’ to public input. Let’s hear it otherwise, where’d \$100 come from if it is based on Market Analysis of similar sorts of opportunities within Oregon and Washington?

The Fee Plan speaks at length with numerous mentions of supporting Search and Rescue operations. And yet of the proposed budget only \$10,000 is mentioned as going to S&R and Sheriff offices. Between PMR, Crag Rats, Clackamas, and Hood River County Sheriff, this amounts to \$2,500 a year per office. This seems like a paltry sum for the highlighting of coordinating and supporting their efforts. This amounts to 6% of the climbing revenue. While I know these agencies appreciate all funding, I have no doubt the Mazamas or any other climbing organization could do an annual charity benefit to raise these funds without necessitating a permit for public access to public lands.

Another issue with the proposal is that the total permits estimated to be sold is 7,500 per year. Yet MHN’s own ‘guess’ is that 10,000 people climb per year. Why is there a divergence of 2,500 less permits expected to be sold vs the the ‘10,000’ climbers number? Is this the expected non-compliance rate? Is it expected that ¼ of climbers will not obtain a permit? Or is the permit expected to dissuade people from climbing? The Forest Service never provides their basis for arriving at these numbers, nor the number of annual permits only being 375, which seems laughably low when the FS explains how usage is way up year-around. Does the FS anticipate permits will suppress usage on an annual basis from current trends?

There are many other points of improvement and I would recommend referencing the Portland Area Climbing Coalition comments in the RAC report which details Climbing Ranger certification requirements, changes to elevation, fee authority to consider climbing at all times as a type of Special Recreation despite it not being specifically enumerated in FLREA, and equitable access concerns.

3 – Increase in Security

The Mt. Hood National Forest website mentioned previously also states: “Visitors to areas where the

Forest is charging a fee will see increased visitor security”

<https://www.fs.usda.gov/detail/mthood/recreation/?cid=FSEPRD1042889>

The Forest Service has not provided any baseline metrics of security patrols, citations, warnings, or criminal activity prevented or addressed, nor any tangible measurement process by which the public would recognize increased visitor security is occurring.

Salmon River West Trail Head is already a fee required trail head that has frequent break-ins and the ZigZag Ranger station personnel have discouraged use of this trailhead due to break-ins. Yet the public is to believe even more remote trailheads that enact a new fee will see increased security?

For new fee sites under amenities the FS states: “respond to emergencies only” (page number 3 of RAC report) – this sounds contradictory to ‘see increased visitor security’ as stated in their materials

Once again the FS has failed to demonstrate effective base lining and how their increased security services will be quantified and demonstrated to the public. MHNH is also potentially opening themselves up to liability when they are advertising visitor security and then cannot provide it. Ludwig v. United States is pertinent here, despite a favorable outcome for the Forest Service, the specific mention of security could become a liability if the Forest Service advertises it but does not provide it, including when suggesting there will be more of it if the public pays more fees.

4 – Establishment of New Fee areas

The Forest Service is using two sets of unequal numbers and not presenting the full story for new fee proposals. The listed amenities will be:

Amenities: Garbage receptacle, gravel parking area, permanent sign on kiosk or stand alone, picnic tables, respond to emergencies only, vault toilet, graveled access road, fee station, recreation opportunities adjacent

It is interesting that a fee station is considered an amenity. Is receiving a bill considered a service?

It is also mentioned picnic tables, plural, yet many existing fee sites throughout the National Forests in Oregon and Washington do not have multiple picnic tables, nor have a vault toilet (Top Spur Trailhead comes to mind).

The FS says new amenities must be built before they can charge money. What the FS does not explain is where this money is coming from. If there is money for capital improvements, why can this not be spent on deferred maintenance backlogs?

None of these proposals where new capital improvements must be made show the increase in expenses for a site. They only compare projected revenue with existing expenses, omitting the capital costs and expanded operations and maintenance costs.

A great example is Lolo Pass, a popular staging area and trailhead.

Total Operations and Maintenance: \$1,210.00

Deferred Maintenance: \$0.00

Current Revenue: \$0.00

Predicted Revenue: \$3,031.25

What is the cost for a vault toilet installation? I have heard it is on the order of \$25,000 to \$40,000 depending on the location. At the low end of these cost points it would take 8.2 years to recoup the cost based on revenue alone going solely to the vault toilet cost. This doesn't account for trash service, toilet paper stocking, pump out, storm, snow, or tree-fall damage, and inevitable vandalism.

At a site like Keep's Mill, the Forest Service says no improvements are needed. Yet under FLREA for an expanded amenity fee to be charged, a majority of the following services must be provided:

- (A) Use of developed campgrounds that provide at least a majority of the following:
 - (i) Tent or trailer spaces.
 - (ii) Picnic tables.
 - (iii) Drinking water.
 - (iv) Access roads.
 - (v) The collection of the fee by an employee or agent of the Federal land management agency.
 - (vi) Reasonable visitor protection.
 - (vii) Refuse containers.
 - (viii) Toilet facilities.
 - (ix) Simple devices for containing a campfire.

It is ironic the 'access road' is listed as difficult and requiring high clearance. There is no drinking water, no visitor protection, no trash service, and no agent (unless we are considering a fee tube to be an amenity here), thus not meeting the bar of a majority of services (4 out of 5). There is no listing online if fire pits exist here, so the 'access road' may be moot.

Per the FS website (<https://www.fs.usda.gov/recarea/mthood/recarea/?recid=52824>) this campground is described as:

This is a small, primitive campground for people who are interested in getting away from a crowd.

And yet the FS now wants to consider this campground an Expanded Amenity Fee area? Despite saying it does not need any amenities added. How can it both be a primitive area with minimal amenities and yet doesn't need anything added, and becomes an amenity area?

This is not an accurate portrayal of long-term costs. Mount Hood National Forest, like many National Forests has a deferred maintenance backlog. MHNH fails to present any case to explain how new capital improvement projects will not contribute to an increase in existing deferred maintenance.

5 – Fee increases for Lookouts

This is an especially galling section of the fee proposal. The justification is to make fees uniform forest-wide based on similar amenities. The proposal says the accomplishment of raising the fees will be as follows:

Planned Accomplishments

With additional fee revenue the Recreation program will: maintain the site at a high standard for visitors, modernize the amenities provided for comfort and enjoyment at the facility, increase the presence of personnel at the site, and provide additional recreational and educational visitor information.

Clear Lake

Total Operations and Maintenance: \$1,251.63

Deferred Maintenance: \$0.00

Current Revenue: \$8,054.00

Predicted Revenue: \$11,276.00

Five Mile Butte

Total Operations and Maintenance: \$7,546.94

Deferred Maintenance: \$0.00

Current Revenue: \$13,687.00

Predicted Revenue: \$19,161.00

For Clear Lake, the Forest Service current runs a surplus of \$6,802.37 and for Five Mile Butte, \$6,140.06. There is a desire to increase the surplus to \$10,024.37 and \$11,614.06, respectively. And Clear Lake is staffed by fire personnel in the summer, is this site not receiving any additional funding during that time of year through that mechanism, which contributes to maintenance?

The glaring omission is that volunteer labor and materials have been an intrinsic part of each site's existing great upkeep. The FS should be more transparent about this. It appears the Forest Service wants more money for these sites which already provide adequate revenue to sustain them, that have no deferred maintenance. Without any concrete plans for how this money would be spent. The FS can say something like '95% of funds collected stay in this national forest' even if the money from renters goes to building a vault toilet, this isn't really transparent. And the public wonders where the money is really going when picnic tables are falling apart, porta-potties exist instead of vault toilets, and volunteers do the labor and maintenance on trails and lookout towers.

The Forest Service fails to detail what amenities will be modernized, demonstrate a public request for more FS personnel presence while users are at the site, and what costs are associated with additional recreational and educational information. And why these accomplishments cannot be done with \$6,800 and \$6,140 a year, respectively.

6 – Equitable Access and the Use of Recreation.gov

Recreation.gov harvests fees from the public for public access to public lands. They are run by Booz Allen Hamilton, a multi-billion dollar federal contracting behemoth, which was already paid \$187 million of tax-payer money to create the system they use. Booz Allen Hamilton is owned by Carlyle Group, a private equity firm with \$369 billion in assets.

Their fees are non-refundable. There is not an incentive for them to provide good service, the competition for large federal contracts like recreation.gov is limited. They leech money off the public for access to public lands.

They require you to make an account, provide an email address, phone number, credit card, credit card billing address. Why is this information required to climb a mountain or reserve a lookout tower? Is this equitable for those without internet access, credit cards, and accessible for the disabled?

How is increasing fees in more places, including 'primitive' areas (like Keep's Mill) maintain equitable access? Removing free campsites does not achieve this end, but creates barriers for new people to experience a place.

7 – OHV fees dropped without clear explanation

In a news article on CBS in Portland () Heather Ibsen, public affairs officer for MHNF, is quoted as saying "the proposal will be adjusted based on feedback. If there's strong negative feedback toward some sites on the list, they could be removed."

It does not seem any sites have been dropped despite lots of negative comments about Lookout Fees, Climbing permit and fees, current free primitive camp sites, etc.

However the proposed OHV sites were dropped.

OHV is mentioned 6 times in the public comments, they are as follows:

"I think OHV sites should have a much much steeper price increase as they are so destructive to the land, fauna with sensitive ears, flora and other human beings in the area. Allowing OHV is a terrible idea & should never have been allowed but I know it isn't going away."

“OHV site fees are per car. Are they per day also? Response from Forest Service: Yes, the proposed McCubbins OHV site fee would be per day, per vehicle. (Vehicle you got there by, not by OHV.)”

“252. Oh I'd love an OHV Ranger at La Dee Flats, it might keep out the red necks leaving empty coors lite cans and fires burning.”

“Why is their fee proposed to be so much higher than river runners, mt bikers, or OHV riders, let alone the dispersed campers who pay nothing but make huge resource impacts?”

These are the only public comments mentioned about OHVs. It is ironic the Forest Service decided to drop these fees when FLREA uses OHVs as an example of a Special Recreation Permit, as it never does mention climbing, hiking, or camping, but instead says:

(h) Special recreation permit fee

The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, **motorized recreational vehicle use**.

The FS explicitly states “After reviewing the comments, the forest will be dropping the three OHV Special Recreation Permits sites”

And yet no where in the comments above where OHV is mentioned, has someone suggested there should not be a fee.

Can the Forest Service please specify the public comment in opposition to OHV fees? Is there other information they have that is not released to the public regarding this?

APPENDIX B: Public Comments received for the 12/12/2022 Hood-Willamette RAC Meeting from Andy Traylor

My name is Andy Traylor and I appreciate the opportunity to provide comments this morning. I'm on the board of a non-profit called the Portland Area Climbers Coalition.

I've also worked for the federal government for over 12 years and I understand what it's like to be on the receiving end of a public comment period. You can't make everyone happy and some people will always find something to complain about.

However, with the climbing permit and fee proposal on Mt Hood, the Forest Service is out of touch with reality and the proposal in its current form will have *no meaningful impact* on safety and instead create a financial barrier that disproportionately affects underserved minority groups and, in fact, goes against the Forest Service's own DEI initiatives.

While the single-use permit fee remains at \$20 per person, I see that the Forest Service lowered the annual permit fee from \$100 dollars down to \$50. During the public meeting on September 8th, a Forest Service staff member said "We proposed \$100 to see what public reaction was". This is a complete abdication of public trust. The amount charged for a permit should not be "what you can get away with", but based on clear market research and services provided.

This might be one of the reasons the term "money grab" comes up so often in the public comments. I'm looking forward to seeing the Forest Service present their analysis of these comments and a summary of positive vs negative feedback. From what I've read, the majority of the comments regarding the climbing permit are largely negative.

In fact, the Forest Service even ignored specific feedback provided by Portland Mountain Rescue, the Crag Rats, and the Mazamas. These are groups with which the Forest Service claimed to partner with on the development of this proposal.

Additionally, the Portland Area Climbers Coalition, the High Desert Climbers Alliance, and the Access Fund (a national-level climbing and advocacy group) have all offered to help the Forest Service shape this program into something useful, but that offer has been ignored.

I want to make two quick points in my remaining time:

#1 regarding cost

The comparison to the annual \$53 permit on Mt Rainier is ludicrous. Mt Rainier has a staffed ranger station at 10,000 ft with a 25-person public shelter and multiple toilets where they helicopter your poop off the mountain a couple times each year. Nothing even remotely close to this will be provided on Mt Hood.

#2 on safety

A couple seasonal GS-5 climbing rangers will make no meaningful difference in safety without, AT MINIMUM, a Rec Level 1 Avalanche certification, some amount of AMGA alpine or ski guide training, and a Wilderness First Responder certification. As stated in several public comments, the Forest Service needs to consult with the National Parks Service on climbing ranger prerequisites and necessary training.

I urge the RAC to critically examine the proposed climbing permit and fee, and take a look at the public comments. The Forest Service needs to go back to the drawing board on this one. At the very minimum, they need to conduct a low-cost pilot program to demonstrate that any fees charged have the ability to provide a tangible benefit to the public.

Thank you.

APPENDIX C: Public comments received for the 12/12/2022 Hood-Willamette RAC Meeting from Kathrin Dragich

From: [Kathrin Dragich](#)
To: [Sorensen, Jennifer -FS](#)
Subject: Re: [External Email]December 12, 2022 RAC meeting
Date: Monday, December 12, 2022 2:12:36 AM

Hi, Jennifer,

Unfortunately, I'm not able to attend or call in to the meeting. However, I prepared a written comment that I'd like you to share with the RAC. Thank you.

Kathrin Dragich

...

This statement is my opposition to the Mt Hood Climbing fee proposal.

1. It's in the public's best interest to have this matter heard by a Recreational RAC, as specified in the FLREA.

While I appreciate you being here, you are members of a Title II Resource Advisory Committee, where you review proposals for Title II projects. The Mt Hood Climbing Fee proposal is NOT a Title II project. It is governed by the Federal Lands Recreation and Enhancement Act (FLREA), which provides that the Forest Service shall form a Recreational Resource Advisory Committee, whose membership should consist of a broad group of folks related only to recreation, tourism, state and tribal interests. While the Act does provide an exception to this requirement, the Forest Service has not explained why it has not convened a Recreational RAC, which would be more appropriate for a proposal as significant/important as the Mt Hood Climbing Fee proposal. A broad panel of recreational users should be a part of this process. I urge you to hold the Forest Service accountable here, act in the public's best interest, vote no, and ask that the Forest Service convene a Recreational RAC to hear this matter.

2. As indicated in the public comment materials, the Forest Service does not have general public support for this Fee proposal.

The FLREA provides:

(9) Approval procedures

[...] A recommendation may be submitted to the Secretary only if the recommendation is approved by a majority of the members of the Committee from each of the categories specified in paragraph (5)(D) **and general public support for the recommendation is documented.**

Hopefully, you've had enough time to read through the packet of information the Forest Service provided for this meeting. If you read the public comments, it is apparent that the Forest Service does not have documented general public support for its climbing fee proposal. The majority of comments expressed opposition to this climbing fee. Therefore, as required by the FLREA, you should recommend that the Forest Service NOT go forward with this fee proposal.

3. This fee is not allowed under the FLREA, which contains a broad ban on fees for public lands under Forest Service management.

There are exceptions to this general broad ban, and the Forest Service argues that the this fee falls under an exception, the special recreation permit fee. However, if you read the language of the FLREA, the climbing fee does not amount to a special recreation permit fee, which the FLREA defines as "specialized

recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use." Climbing Mt. Hood is obviously not one of the three enumerated uses that amount to a special recreation use under the Act. If you review the previous versions of the FLREA before it was enacted into law, you will see that Congress narrowly tailored the language here and purposefully deleted and omitted more broad and inclusive catch-all type language. Therefore, authority for this Fee under the Act is tenuous at best and the fee shouldn't be approved.

4. The Forest Service has not provided information to the public as required by the FLREA on all of the fees that will be charged in association with the Climbing Fee.

The Forest Service plans to use the website rec.gov as the means to sell the permits and collect the climbing fee. However, it did not give public notice of how much that fee will be. In March of this year, a Ninth Circuit district court concluded that the reservation fees charged by Booz Allen Hamilton on rec.gov are also recreation fees under the FLREA and are subject public notice and comment. (See, **Kotab v. Bureau of Land Mgmt**, 2:20-cv-01957-JAD-EJY (D. Nev. Mar. 31, 2022)). While this case is a district court case and not legally binding on all district courts, it is enlightening on how a court is likely to rule if a similar challenge were made here.

In fact, as shown in the packet of materials for this meeting, out of concern for the Kotab case and in an effort to correct its failure to follow the law, the Forest Service in the Columbia Gorge is now presenting you with the information on the reservation fee that it already instituted this year. (And, by the way, since the Columbia Gorge NRA did not give notice to the public (to my knowledge after an internet search) about this RAC meeting on the \$2 reservation fee it already instituted, you should also vote no on that fee proposal, as well. Please hold the Forest Service accountable and make it follow the process required by law. Transparency and public involvement are important.)

4. The Forest Service hasn't justified the need for the fee.

This fee will simply create more red tape and put up a financial barrier to accessing our public land. The Forest Service states that increased use results in increased need for rescues, but, it hasn't really backed that statement up with statistics, by comparing year to year climbing accidents/deaths/rescues. Regardless, the climbing rangers will not be on the route when climbers are attempting the summit, and therefore, they will not offer any additional level of safety for climbers, anyway. Instead, these rangers will be there after the fact, most likely to enforce permits and attempt to cite recreational users for simply accessing their public land. Moreover, charging this fee may also end up causing more accidents and/or the need for more rescues. When folks have to pay a large fee to access terrain, they are more likely to proceed when conditions or weather are bad. Even the Search and Rescue entities expressed this concern in their public comments on this fee, as well. In the end, this fee may ultimately do more harm than good and it isn't justified.

5. The climbing fee is an unfair barrier to those members of the community with lower income levels.

We all collectively own our public land and pay tax on it. Charging people to access this land is inherently wrong, and will result in unfairly excluding many people. Please review the many studies available on the internet showing the demographics of those people who are impacted by user fees.

6. This climbing fee proposal will add even more of our public land into the Booz Allen Hamilton operated rec.gov reservation system, where "we the people" pay private corporation Booz Allen Hamilton millions of dollars to access our public land! This is wrong. Where does this end? Will every wilderness and climbing area in the United States ultimately be subject to private profit public land gatekeeper Booz Allen Hamilton? This trend is alarming. Please do not add yet another piece of our land into this awful gatekeeping system.

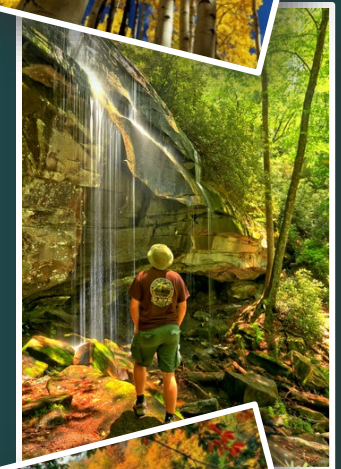
Given all of the issues with the Mt Hood fee proposal, I urge you to vote against the fee proposal and

recommend that the Forest Service NOT proceed with the Mt Hood Climbing fee.

Thank you for your time and consideration.

Resource Advisory Committee

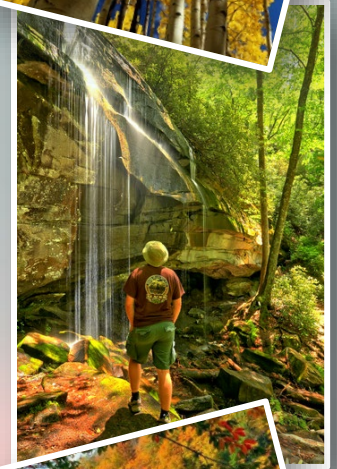
Understanding the Federal Lands
Recreation Enhancement Act



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Topics

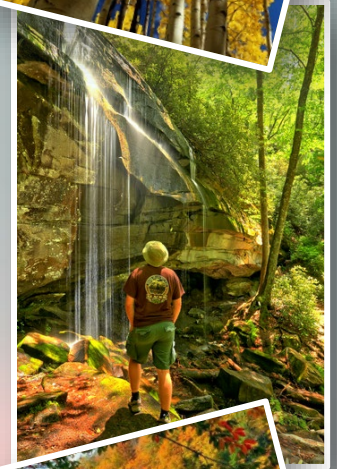
- **Recreation Overview**
- Recreation Enhancement Act (REA)
- Public Involvement and Your Role
- Advisory Committee Organization



Recreation Overview

The Forest Service offers a huge array of recreation opportunities

- Auto Tour
- Bike
- Boat
- Camp (Tent or RV)
- Climb
- Historic/Cultural Sites
- Educational Programs
- Fish
- Hike
- Hunt
- Learn at Visitor Centers
- Rent a Cabin
- Ride Horses
- Ride Quads
- Ski
- Snowmobile
- View Wildlife
- Water Sports



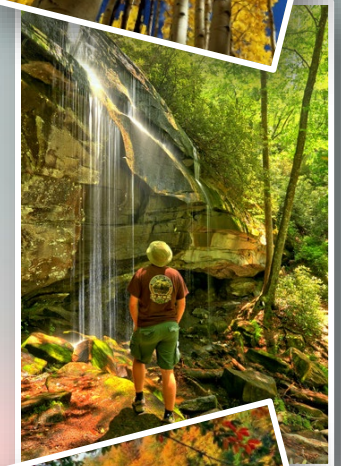
Recreation Overview continued

Did you know...

Overview	FS	BLM
Visits per year	168 Million	73 Million
Acres managed	232 Million	245 Million
Campsites/ Picnic sites	122,000/ 11,000	19,452
Miles of trails	158,070	27,627

Largest source of outdoor recreation opportunities.

Largest acreage available for recreation.



Recreation Overview continued

Did you know...

The **Forest Service** has **200** units:

- 154 National Forests
- 20 National Grasslands
- 20 National Recreation Areas
- 6 National Monuments

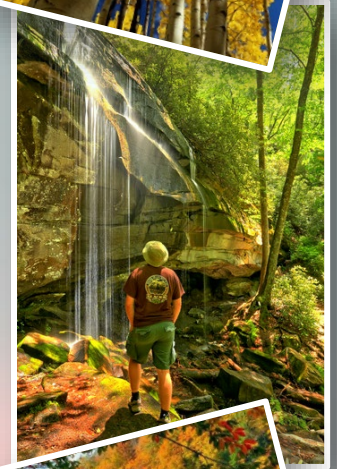
The **Bureau of Land Management**

- has **237** Districts



Topics

- Recreation Overview
- **Recreation Enhancement Act (REA)**
- Public Involvement and Your Role
- Advisory Committee Organization

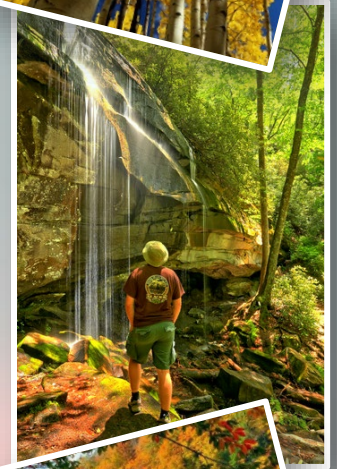


Recreation Enhancement Act (REA)

Authority for National Park Service (NPS), Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), Bureau of Reclamation (BOR), and Forest Service (FS). Currently extended to October 1st 2023.

Permits these agencies to retain fees at developed recreation sites such as:

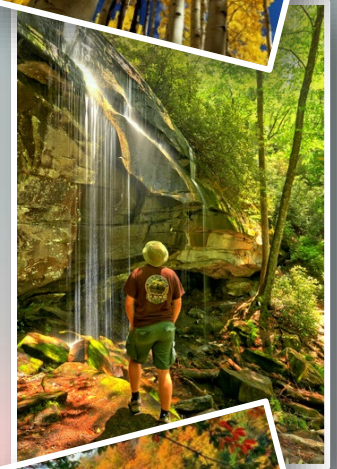
- **campgrounds**
- **rental cabins**
- **day-use sites**



Recreation Enhancement Act (REA) continued

Kinds of Fees Authorized for the FS & BLM:

- Standard Amenity Fees
- Expanded Amenity Fees
- Special Recreation Permits



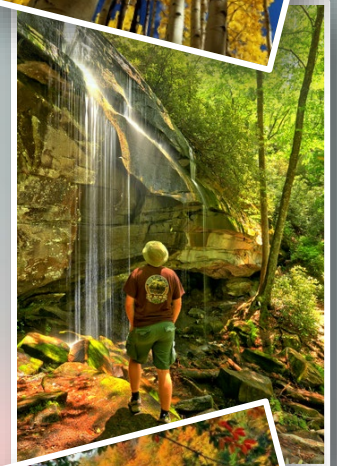
Recreation Enhancement Act (REA) continued

Standard Amenity Fees:

Day-use fees where certain services and facilities must be in place at individual sites.

Requirements are:

- Permanent Toilet
- Permanent Trash
- Picnic Table
- Parking
- Security
- Interpretive Sign

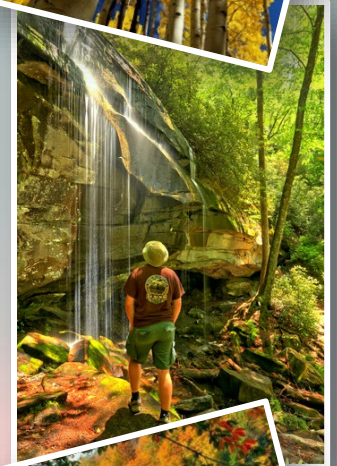


Recreation Enhancement Act (REA) continued

Expanded Amenity Fees:

Fees for facilities or services that provide direct benefits to people. **Examples include:**

- Developed campgrounds
- Highly developed boat launches
- Cabin rentals
- Hook-ups and dump stations
- Enhanced interpretive programming
- Transportation services
- Reservation services



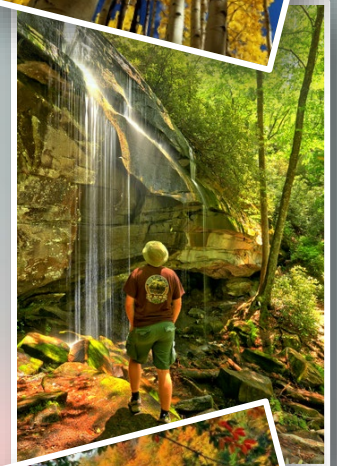
Recreation Enhancement Act (REA) continued

Special Recreation Permits

Permit for specialized recreation uses of Federal recreational lands and where extra measures are needed for natural and cultural resource protection, the health and safety of visitors, to allocate capacity or disperse recreation use.

Examples include:

- Wilderness Areas
- Shooting ranges
- Specialized trails
- Motorized recreational vehicle use

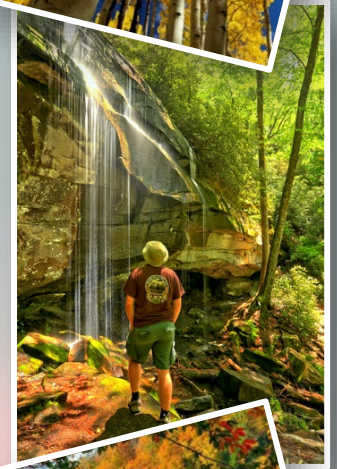


Recreation Enhancement Act

Fee Restrictions or Prohibitions for the FS & BLM:

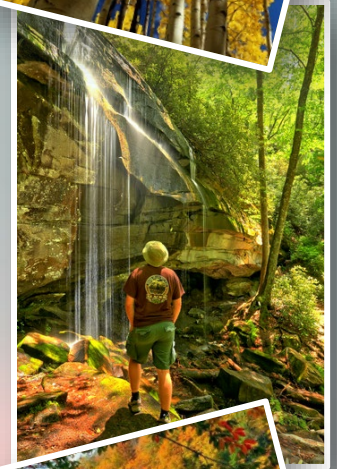
Entrance fees

- Standard amenity fees for people under 16
- Activities such as:
 - Parking along roads or trails with no facilities
 - Stopping at overlooks or scenic pullouts
 - Pass-through travel



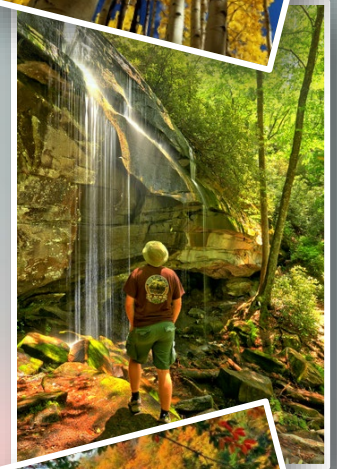
Recreation Enhancement Act

- Requires a majority of revenue to be reinvested in fee sites
- Requires agencies to honor the suite of “America the Beautiful” (aka Interagency) passes.
- Requires public involvement for new fees & fee change proposals.
- Requires use of Advisory Committees to make recommendations on certain aspects of the fee program.



Topic

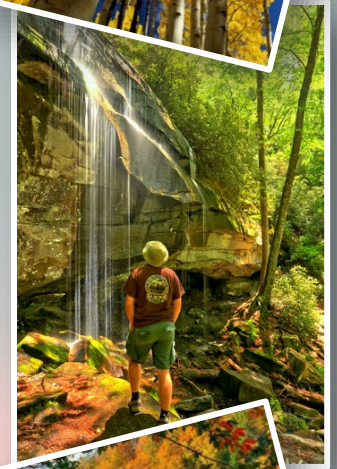
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- **Public Involvement and Your Role**
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Public Involvement Your Role

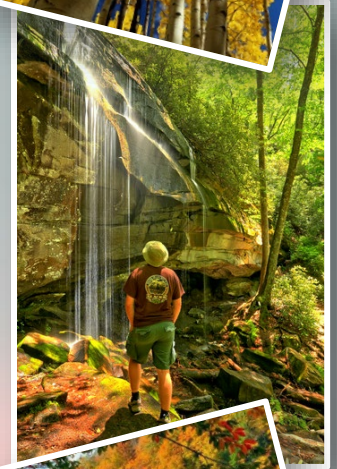
A Resource Advisory Committee (RAC) will make recommendations to the Secretary of Agriculture on:

- **Implementing or eliminating** standard amenity fees, expanded amenity fees, and non-commercial individual special recreation (special use) permit fee;



Public Involvement Your Role continued

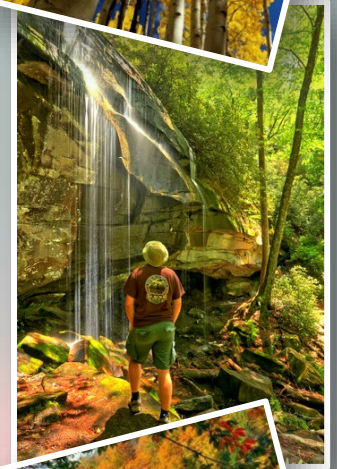
Recommendations on fee proposals must include a **quorum** and a majority of members from each of the member categories.



Public Involvement Your Role continued 2

A RAC may not make recommendations regarding:

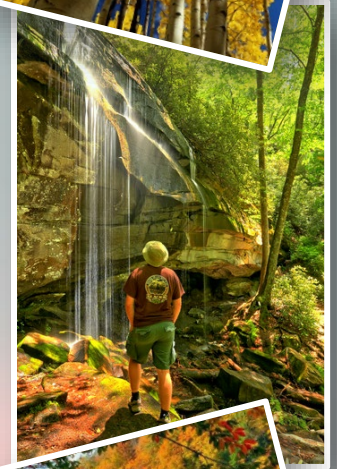
- Sites operated by a concessionaire or contractor.
- Commercial and group special recreation permits (special use permits) such as outfitting and guiding or recreation events



Public Involvement Your Role continued

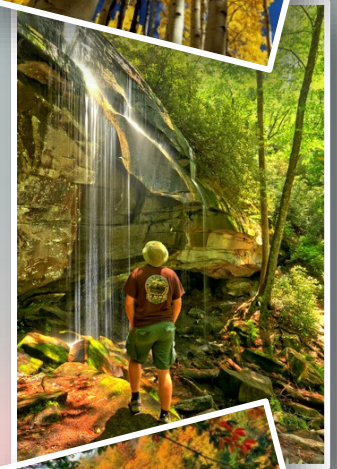
RACs are part of a larger public involvement effort:

- BLM and FS must conduct public involvement when making recreation fee changes. These may include steps like newspaper articles and posting notices on-site or, when adding new sites, publishing a Federal Register notice.
- Identifying general public support is part of the recommendation process.



Topics

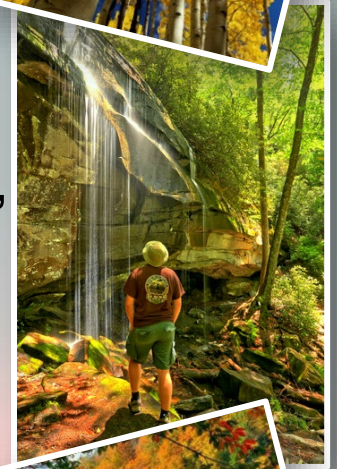
- Recreation Overview
- Recreation Enhancement Act (REA)
- Public Involvement and Your Role
- **Advisory Committees**



Advisory Committee Organization

Under FLREA, the Forest Service can use advisory committees chartered specifically to review fee proposals or existing resource advisory councils.

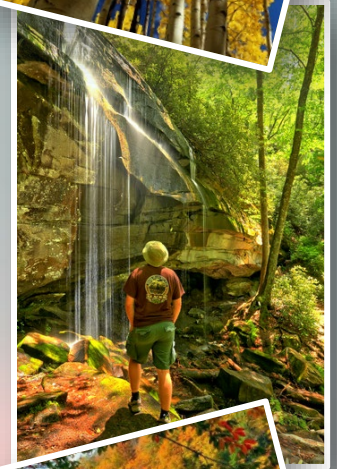
- Where appropriate or possible, the Forest Service and BLM have agreed to use a shared RAC approach.
- Potential options are FS Recreation RAC, BLM RAC, other RACs appointed by the Secretary (such as Secure Rural Schools), no Recreation RAC if requested by the Governor of each state.



Thank You!

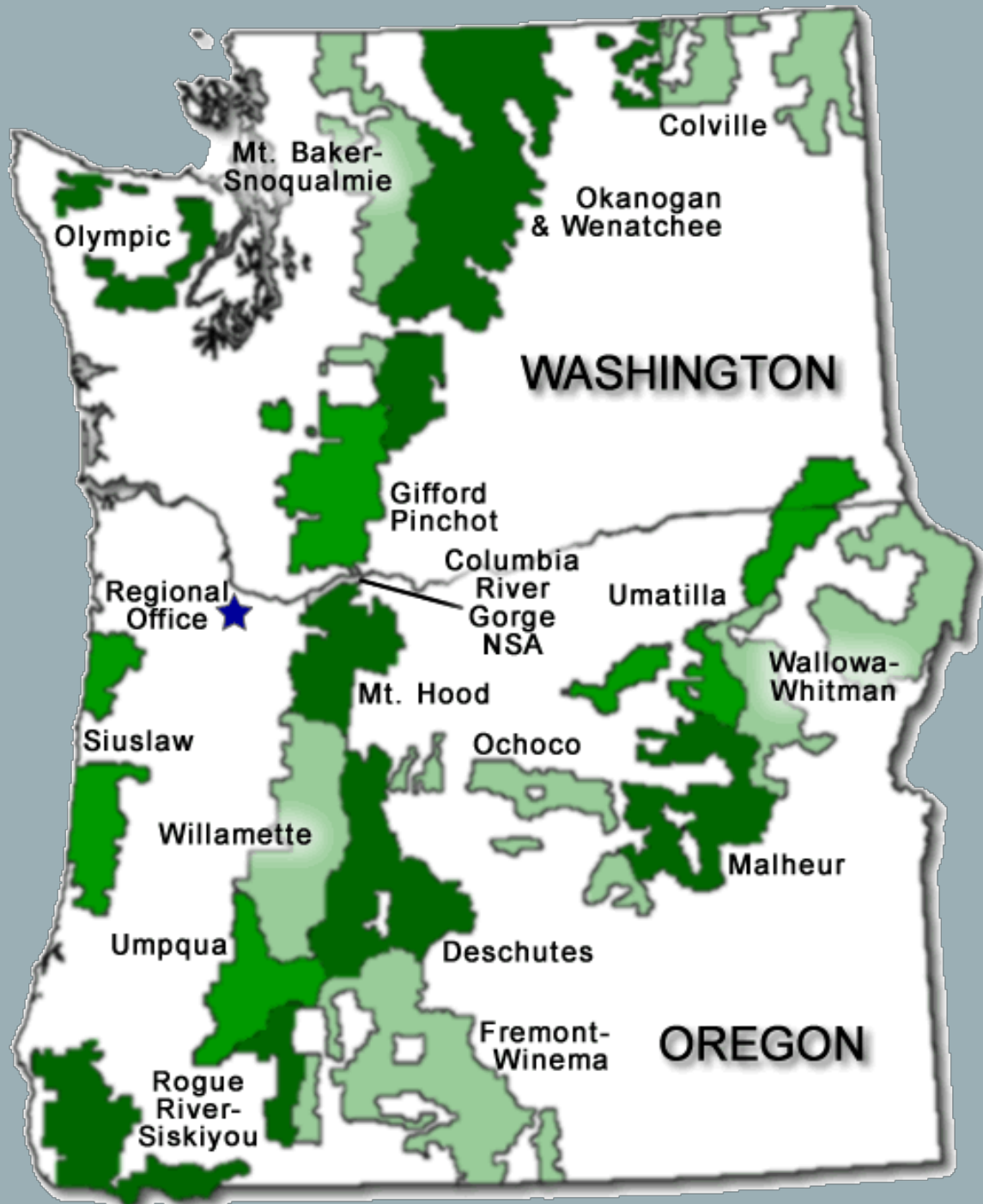
*We look forward to the advice
and assistance you provide on
Recreation Fees!*

**Understanding the Federal Lands
Recreation Enhancement Act**

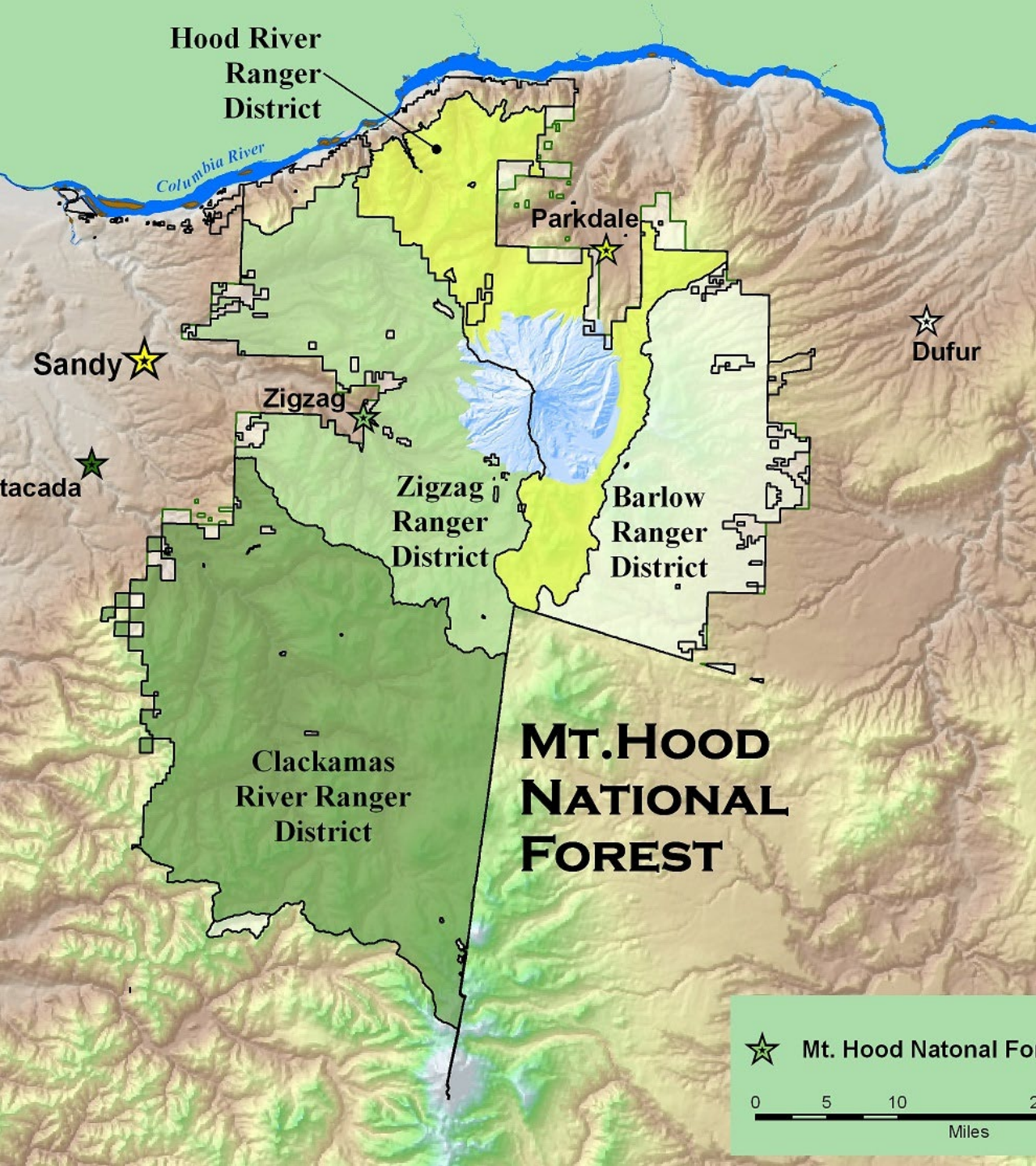




**MT HOOD NATIONAL FOREST
RECREATION FEE PROPOSAL
PUBLIC OUTREACH 2022**



PACIFIC NORTHWEST REGION



MT HOOD NATIONAL FOREST

☆ Mt. Hood Natonal Fo

0 5 10 20
Miles

NATIONAL VISITOR USE MONITORING 2016 STATISTICS

2,945,000 visitors per year

Main Activity on Forest

1. Downhill Skiing
2. Hiking/Walking
3. Viewing Natural Features

Annual Visitation Estimates

- 212,000 visits for designated Wilderness visits
- 197,000 visits for overnight use in developed sites
- 621,000 visits for general forest area use
- 1,914,000 visits for day use at developed sites

Area Lodging Use

- 23% Forest Campgrounds
- 11% Undeveloped Camping on Forest Service
- 3% Other Public Campground
- 27% Rented Forest Service Cabin
- 29% Rented Private Home
- 13% Home of Friends/Family



Recreation	68.0%
Use Bathroom	3.2%
Work or Commute	4.1%
Passing Through	19.9%
Some Other Reason	4.8%
Total:	100.0%

AMENITIES REQUIRED TO CHARGE A FEE

Day Use Sites (all required):

- Designated Parking
- Toilet Facility
- Garbage Collection
- Interpretive Sign/Kiosk
- Picnic Tables
- Security

Campgrounds (majority listed below):

- Tent/Trailer Space
- Picnic Tables
- Drinking Water
- Access Roads
- Fee Collection
- Security
- Garbage Collection
- Toilet Facility
- Device for Campfire

HOW ARE DEVELOPED RECREATION FEES SET?



PUBLIC INVOLVEMENT



MARKET ANALYSIS

OVERVIEW OF FEE PROPOSAL

Proposed Site Type	Current Fee	Proposed Fee	Changes to Fee Proposal:
9 Day Use Sites	\$0 per day	\$5 per day	
3 OHV Day Use Sites	\$0 per day	\$5 per day	Will remain free
10 Campgrounds	\$0 per night	\$10 per night	
2 Lookouts	\$0-\$50 per night	\$85 per night	
1 Yurt/Cabin	\$0 per night	\$100 per night	
Mt Hood Summit Pass (above 9,500 ft)	\$0 2-day permit \$0 annual pass	\$20 2-day pass \$100 annual pass	Lower annual pass to \$50

Proposed New Day Use Sites

- \$0 to \$5 per day
- 9 day use sites

Amenities:

- Fee station
- Picnic tables
- Garbage collection
- Kiosk
- Gravel roads and parking
- Vault toilet
- Security



Pegleg Picnic Site



Fifteenmile Trailhead

\$10 Campgrounds

- \$0 to \$10 per night
- 10 campgrounds

Amenities:

- Fee Station
- Fire ring
- Picnic tables
- Garbage collection
- Gravel road and parking
- Vault toilet
- Security



White River Station Campground



Badger Lake Campground

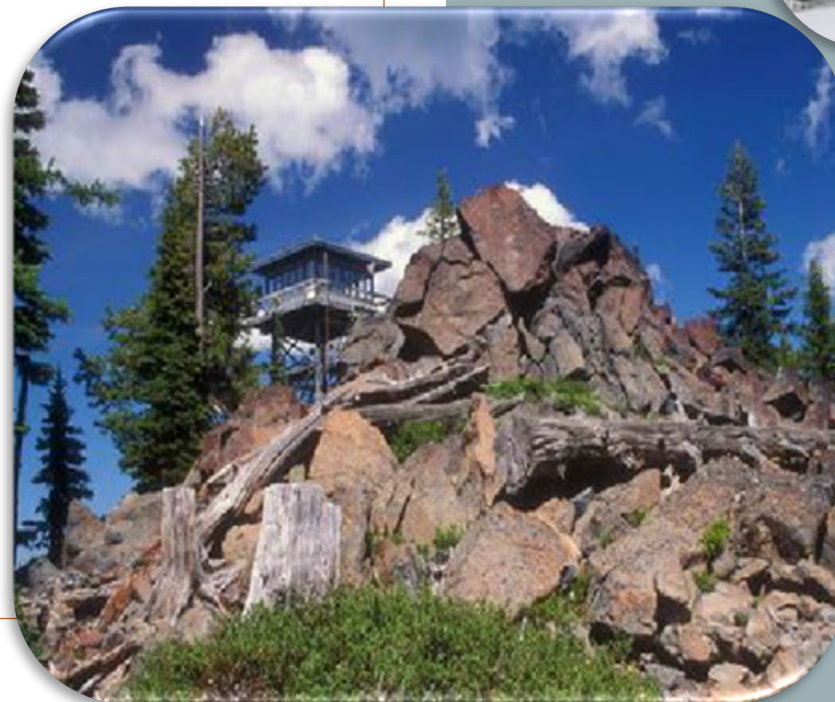
\$85 Lookouts

- \$50 to \$85 per night
- Clear Lake Butte Lookout
- Five Mile Butte Lookout

Amenities:

- Reservable
- Basic Kitchen Supplies
- Propane Lights/Appliances
- Wood Stove
- Firewood provided
- Gravel road and parking
- Vault Toilet
- Capacity up to 4 people

Clear Lake Butte Lookout



Five Mile Butte Lookout

\$100 Cabins/Lookout

- \$0 to \$100 per night
- Trillium Winter Yurt

Amenities:

- Reservable
- Basic Kitchen Supplies
- Propane Lights/Appliances
- Propane Heat
- Gravel road and parking
- Vault Toilet
- Capacity up to 8 people



Climbing Permit

- \$0 to \$20 per day/person
- \$0 to \$50 annual pass/person

Amenities:

- Climber Registration & Information Facilities
- Kiosk
- Climber Information
- Paved roads & parking
- Restroom Facilities
- WAG bag human pack-out system
- Financial support to search & rescue and partners



95%



Repair, maintain, and enhance facilities related directly to visitor access, and health and safety.



Interpretation, visitor information, visitor services, visitor needs assessments, and signs.



Law enforcement related to visitor use.



Habitat restoration directly related to wildlife-dependent recreation including hunting, fishing, wildlife observation, and photography.



Direct operating associated with the recreation fee program.

HOW FEES ARE USED

ACCOMPLISHMENTS

- Repaint structures
- Improve tent sites
- Improve electrical system
- Expand trail system and connector trails
- Maintain the site at a high standard for visitors
- Modernize the amenities provided for comfort and enjoyment at the facility
- Increase the presence of personnel at the site
- Provide additional recreational and educational visitor information.



FEE FREE DAYS AND PASSES

National Fee Free Days:

- Martin Luther King Jr. Day
- President's Day
- National Get Outdoors Day
- National Public Lands Day
- Veterans Day



Interagency & **Forest** Passes



PUBLIC INVOLVEMENT ACTIONS

- Recreation Site Proposal August 1 to September 30, 2022
 - Posted on Forest website
 - Signs posted onsite
 - Twitter message and Facebook posts
 - News Release distributed
 - *KOIN – August 2*
 - *Estacada News – August 3*
 - *Willamette Week – August 3*
 - *Unofficial Networks – August 4*
 - *Salem Statesman Journal – August 4*
 - *Oregon Hikers – August 1*
 - Federal Register Notice published August 15, 2022
 - Facebook Live Meeting on September 7
 - 32-35 participants

An official website of the United States government [Here's how you know](#)

USDA Forest Service Caring For the Land and Serving People **Mt. Hood National Forest**

Forest Service Home | About the Agency | Contact the National Office | Inside the FS

Home | Visit Us | Managing the Land | Learn | Working With Us | About Us

Mt. Hood National Forest seeking feedback on proposed changes to climbing and recreation fees

Release Date: Aug 1, 2022

Mt. Hood National Forest is proposing to charge new and increased fees at 26 developed recreation sites. Included in the proposed changes will be a climbing permit for those traveling above 9,500 feet. Fee changes are being considered to allow the forest to continue to provide services, such as clean restrooms and trash collection, and to provide for the health and public safety expected by visitors at recreation sites. These fees will also be used for larger scale maintenance and improvement projects at sites where fees are collected.

"We recognize how important these sites are to people. The fees collected will help offset the increased costs of maintenance at these sites," said Mt. Hood Forest Supervisor Meta Loftsgaarden. "During this public input period, we want to hear feedback and other ideas to help improve services for our visitors."

As part of the proposal, the Forest is considering a climbing permit that will be required for anyone climbing above 9,500 ft. on Mt. Hood. The permit will fund additional climbing rangers to provide adequate climbing patrols and resource protection within the Mt. Hood Wilderness. Additionally, the permit will allow the Forest to provide better climbing education, improve sanitary conditions while reducing human waste, enable infrastructure improvements, and provide support for search and rescue groups on the mountain. Information gathered, including permit numbers will also help inform future management options.

"Every year around 10,000 people climb Mt. Hood," said Loftsgaarden. "The climbing permit will help both the Forest and our search and rescue partners improve safety for climbers while protecting the natural resources of this iconic place."

The climbing permit proposal does not include a limit or cap on the number of climbing permits issued per day. The climbing permit would be required starting in January 2024.

A list of all proposed fee changes is found at: <https://www.fs.usda.gov/goto/mthood/fees>

Fire Danger TODAY

LOW IFPL I

Fire Information

Alerts & Warnings

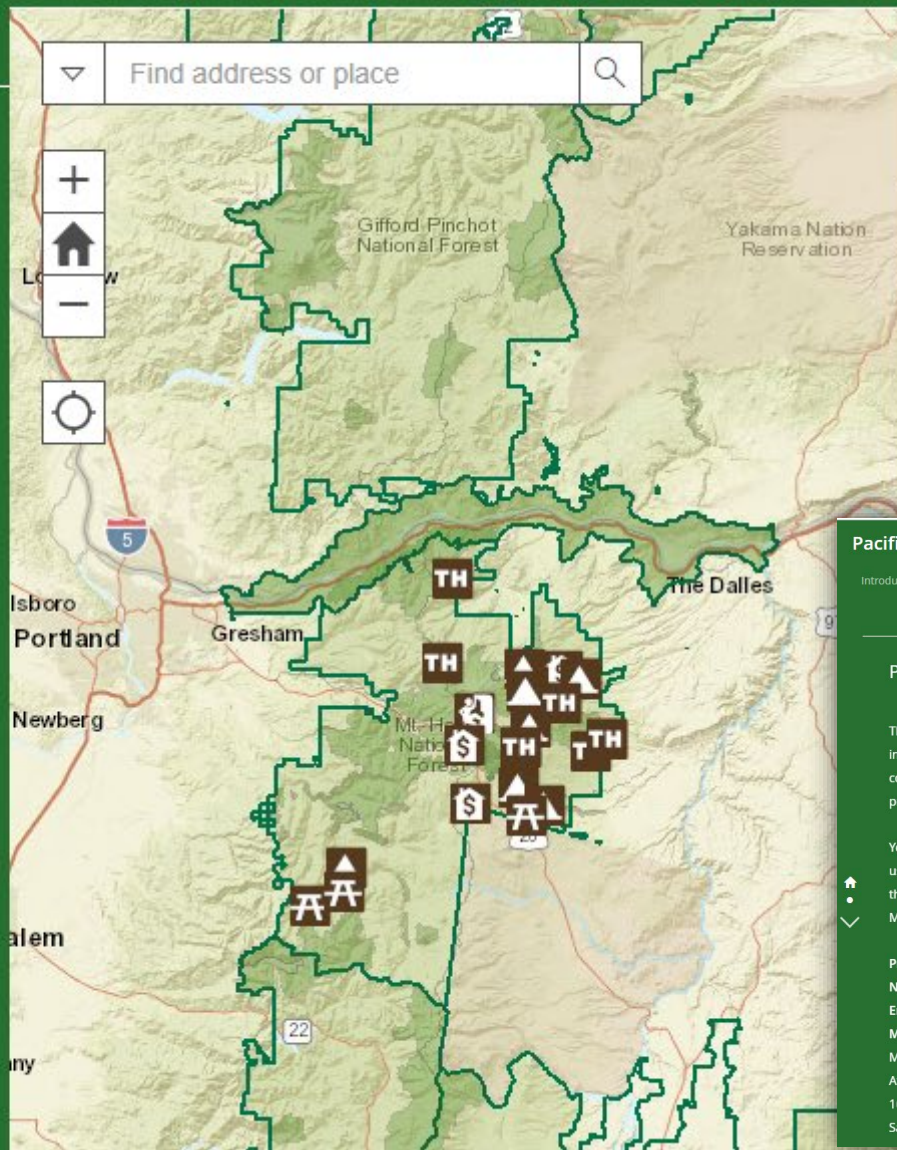
- Road Closures on Clackamas River RD
- Closed Roads on Barlow RD

[View All Forest Alerts](#)

COMMENTING MAPPING TOOL

To submit a general comment please email: SM.FS.MtHoodFees@usda.gov

Sustainable Recreation Program Public Input



Filter list by map

Badger Lake Campground
Badger Lake Trailhead
Bonney Meadows
Bonney Meadows Trailhead

Note: Do not track your physical location if your browser prompts you to. If the map has zoomed to a different location than the project area, press the "Home" button to return to the project.

It's easy-

1. Select the Home button to see the full list of sites
2. Use the Filter list by map toggle to

Pacific Northwest Region – Recreation Fee Proposals

Project Description

The Mt. Hood National Forest is interested in receiving your comments on recreation fee proposals.

You can submit your comments by using the interactive web map from the "Comment - Interactive Web Map" tab below.

Project Point of Contact: Mt. Hood National Forest
Email: SM.FS.MtHoodFees@usda.gov
Mailing Address:
Mt. Hood National Forest
Attn: Recreation Fees
16400 Champion Way
Sandy, OR 97055





PUBLIC
INVOLVEMENT
ACTIONS

The following were briefed through email on August 1, 2022

- Wasco, Hood River, Clackamas, and Multnomah County Commissioners
 - Wasco County Commissioner Kathy Schwartz and she is supportive of the proposal
- Federal Legislators
 - Senator Jeff Merkley, Senator Ron Wyden, Representative Greg Walden, Representative Earl Blumenauer, Representative Kurt Schrader, and Representative Cliff Bentz
- Confederated Tribes of Warm Springs
 - Follow-up emails sent on October 19



PUBLIC
INVOLVEMENT
ACTIONS

- Other Groups Briefed
 - City Representatives
 - National Forest Foundation
 - Stewardship Partners (Oregon Wild, Backcountry Horsemen, Northwest Youth Corps, Trail Keepers of Oregon, 44 Trails, Pacific Crest Trail Association, Motorcycle/ATV Clubs, Collaboratives)
 - Search & Rescue Partners (Sheriff Offices, Crag Rats, Portland Mountain Rescue, Mazamas, Timberline Mountain Guides,)
 - Mt Hood Climbing Outfitters/Guides
 - News outlets and other media
 - Tourism (Boards, Mt. Hood Meadows, Timberline Lodge, Vista Recreation, Olallie Lakes Resort, Lost Lake Resort Inc, Portland General Electric Recreation)
 - Special Use Permit holders including Outfitter & Guides, Organization Camps, and Recreation Events



PUBLIC
INVOLVEMENT
ACTIONS

- Facebook Live Event including Climbers Virtual Town Hall on September 7
 - Two segments:
 - Recreation Site Fee Proposals
 - Climbers Virtual Town Hall
 - 35 participants attended
 - Comments in Appendix A in package
 - 120 from the Live Events
 - 113 from Climbers Virtual Town Meeting

OVERVIEW OF PUBLIC RESULTS

385 comments received (Full comments in package)
(16 respondents commented multiple times)

- 100 via Email
- 233 from the Facebook Live Events
- 52 via Story Map



COMMENT THEMES

Supportive of fees, quotas, limited entry permits, management action to protect the MTH's environment

- *“There is no legal basis for your proposed fees, and your market research-based argument is contrary to the mission of your agency and based on faulty goals.”*

Addressable concerns (Fee is too expensive, limits families with kids, limits school group access, fee is a barrier to access the MTH)

- *“I think \$100 seems expensive and not in alignment with other PNW climbing fees... A lower price, such as \$50, might be more reasonable to the public.”*

Opposed to fees for any form of outdoor recreation (Not specific to MTH)

- *“Our public lands should be free to use - both free as in freedom and free as in no financial cost.”*

Comments not specific to the MTH fee proposal (Appropriations should cover costs, questioning legality of proposal under FLREA, fee sets a precedent in wilderness)

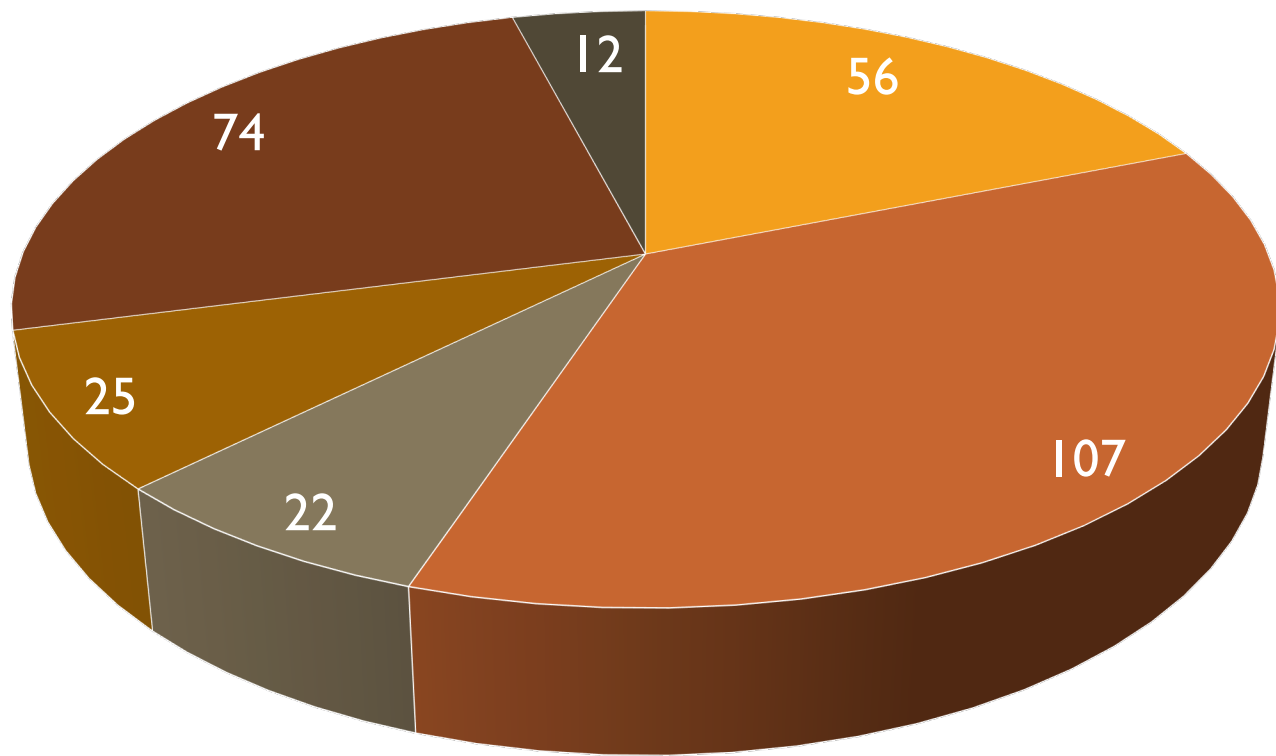
- *“Charging a “fee” to merely hike/climb such as Mt Hood, an undeveloped area, would be in violation of the Recreation Enhancement Act under Federal Law .”*

Comments that were specifically against the MTH fee proposal

- *“Please don't raise fees. It keeps budget conscious users away.”*

Comments that neither indicated general support or non-support for the fee proposal

- *“Increase enforcement, ban target shooting, and address ‘permanent residents’ on Forest.”*



- Supportive of fees, quotas, limited entry permits, management action to protect the MTH's environment
- Addressable concerns (Fee is too expensive, limits families with kids, limits school group access, fee is a barrier to access the MTH)
- Opposed to fees for any form of outdoor recreation (Not specific to MTH)
- Comments not specific to the MTH Fee Proposal (Appropriations should cover costs, questioning legality of proposal under FLREA, fee sets a precedent in wilderness)
- Comments that were specifically against the MTH fee proposal
- Comments that neither indicated general support or non-support for the fee proposal

COMMENT THEMES

CHANGES TO FEE PROPOSAL

Remove 3 OHV sites from proposal

- La Dee Flat OHV Staging Area (Clackamas RD)
- Rock Creek OHV Area – Gate Creek Staging (Barlow RD)
- McCubbins Day Use OHV Area (Barlow RD)

Considerations around Climbing Fee

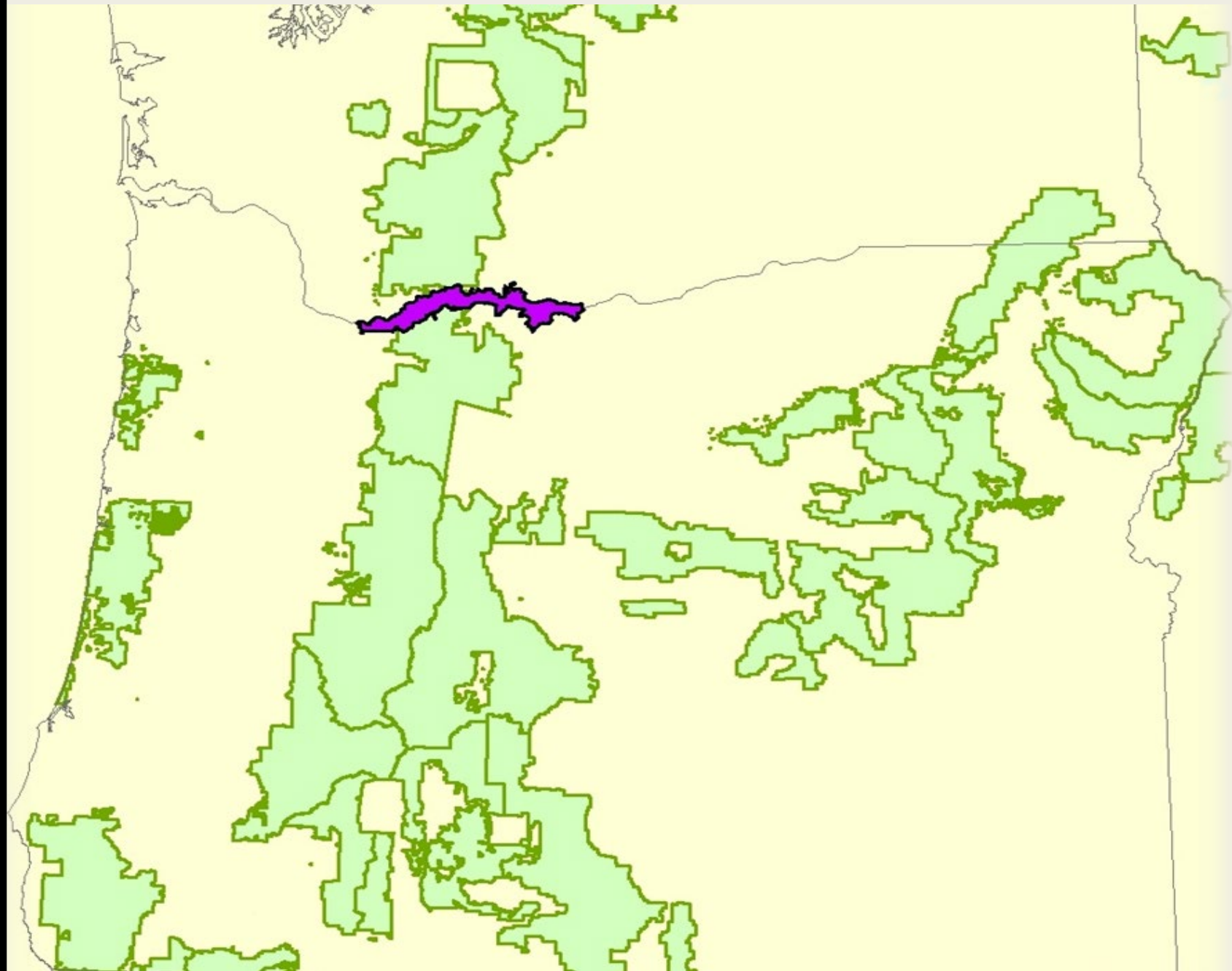
- Cost
- Elevation
- Capacity Limits

QUESTIONS?

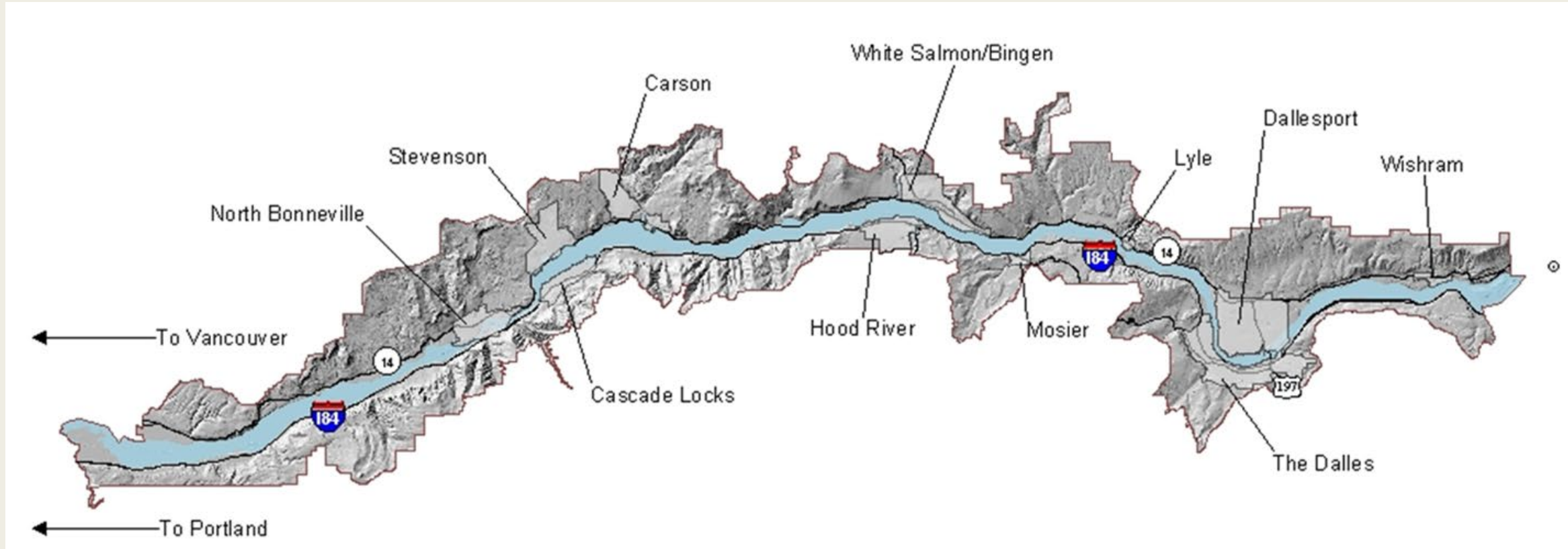


**COLUMBIA RIVER GORGE NATIONAL SCENIC AREA
RECREATION FEE PROPOSAL - 2022**

**Columbia River Gorge
National Scenic Area
Designated in 1986**



Columbia River Gorge National Scenic Area



Columbia River Gorge National Scenic Area

National Visitor Use Monitoring: 2011 to 2016 Statistics

Annual Visitation

Activity	2016 Visits	2011 Visits	% Change
Site Visits	3,238,000	2,388,000	+35.6%
Day Use Dev Site Visits	1,349,000	1,250,000	+8%
Overnight Use Dev Site Visits	7,000	15,000	-53%
General Forest Visits	1,661,000	977,000	+70%
Wilderness Visits	220,000	147,000	+49.6%
Total NF Visits	2,117,000	1,367,000	+54.8%

Columbia River Gorge National Scenic Area

National Visitor Use Monitoring: 2016 Statistics

Activity Participation

Activity	% of visitors who participated in this activity 2016
Hiking/Walking	85.4
Viewing Scenery	70.8
Relaxing	35.2
Driving for pleasure	22.9
Visiting a nature center	13.8
Visiting historic/prehistoric sites	12.1
Nature Study	9.8
Bicycling	2.7

Miles from Survey Respondent's Home to Interview Location	National Forest Visits (%) 2016
0 - 25 miles	23.4
26 - 50 miles	31.4
51 - 75 miles	7.1
76 - 100 miles	1.8
101 - 200 miles	4.5
201 - 500 miles	5.4
Over 500 miles	26.3

Columbia River Gorge National Scenic Area

National Visitor Use Monitoring: 2016 Statistics

Household Income

Annual Household Income	National Forest Visit (%)
Under \$25,000	10.9
\$25,000 to \$49,999	15.6
\$50,000 to \$74,999	22.1
\$75,000 to \$99,999	19.4
\$100,000 to \$149,999	20.8
\$150,000 and up	11.2



Historic Columbia River Highway Congestion and Transportation Safety Improvement Plan

FINAL June 2019

Columbia River Gorge National Scenic Area Need for a Timed Use Permit

- Improve Safety
- Reduce Congestion
- Improve Visitor Experience





- **Waterfall Corridor Timed Use permits**

- *60 available/hour online 9 am - 6 pm*
 - 540 available per day
- *50 available/day in person (no fee)*

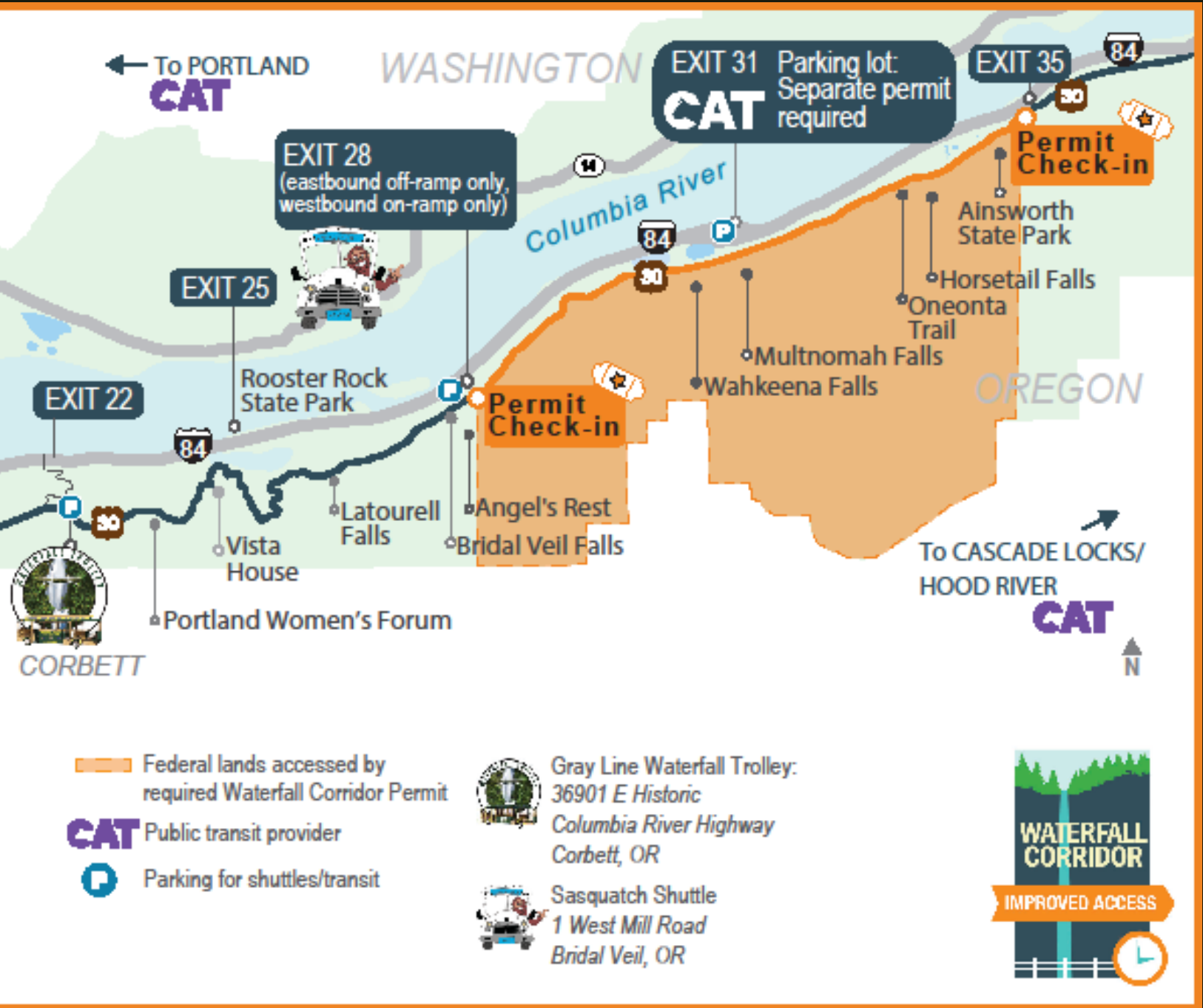
- **Multnomah Falls (I-84) Timed Use permits**

- *140-85 available/hour online 9 am - 6 pm*
 - 910 available per day
- *No permits available in person*



**Columbia River Gorge
National Scenic Area
Need for a Timed Use Permit**

- **Improve Safety**
- **Reduce Congestion**
- **Improve Visitor Experience**

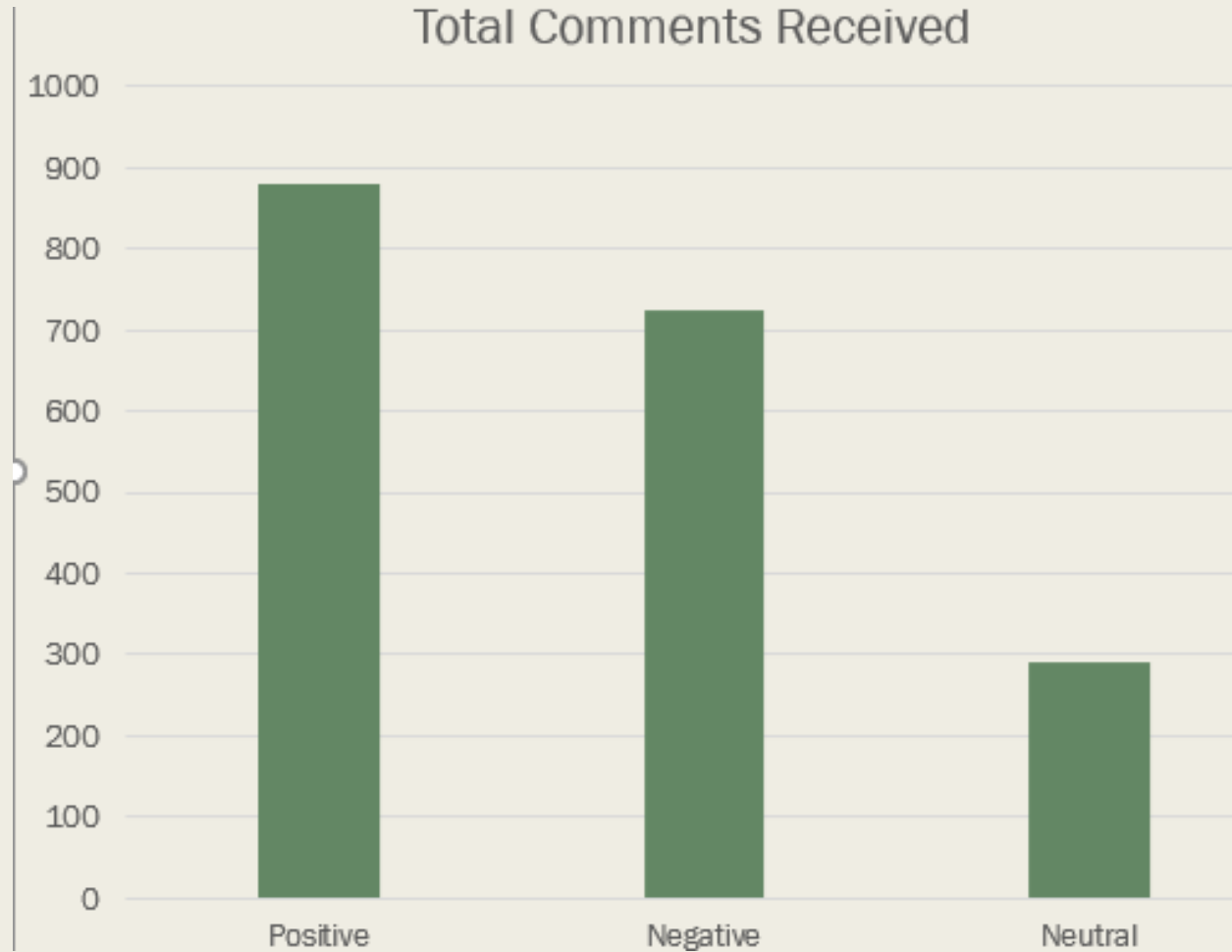


Columbia River Gorge National Scenic Area Need for a Timed Use Permit

- Improve Safety
- Reduce Congestion
- Improve Visitor Experience

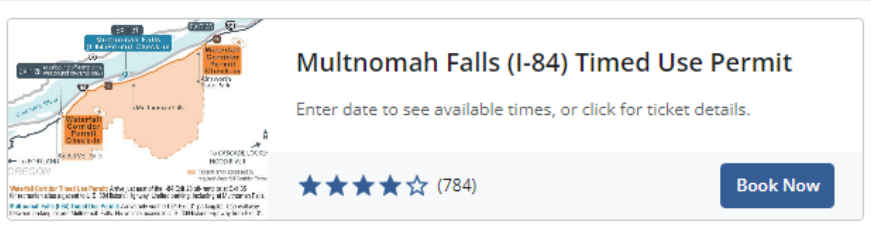
Columbia River Gorge National Scenic Area

Overview of Public Results



Columbia River Gorge National Scenic Area Overview of Public Results

- The two permit system was confusing
 - *Some bought both permits for the same time*
 - *Difference between I-84 and Historic Highway*
- Visitors familiar with the area reported much less congestion, increased ability to park as compared with years past
- Misconception that the permits were a “fee”
- Uncertainty of pre-9 am and post-6 pm visits.

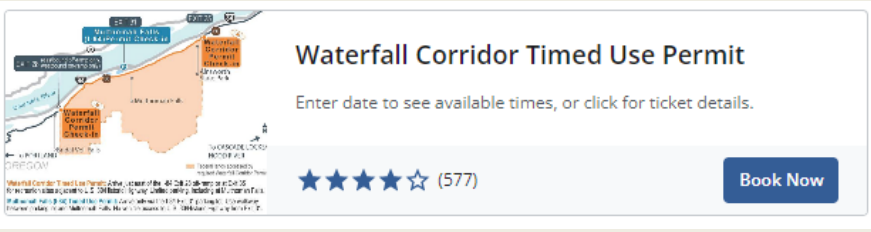


Multnomah Falls (I-84) Timed Use Permit

Enter date to see available times, or click for ticket details.

★★★★☆ (784)

Book Now



Waterfall Corridor Timed Use Permit

Enter date to see available times, or click for ticket details.

★★★★☆ (577)

Book Now

Thank You

Mt Hood National Forest



R6, Pacific Northwest Region Public Involvement 2022

Executive Summary

The Mt. Hood National Forest is proposing to charge new and increased fees at 26 developed recreation sites, including adding several new day use sites to the popular Northwest Forest Pass program. The full suite of interagency passes will also be honored at these new day use sites. Comment period ran from August 1 to September 30, 2022.

Several day-use sites, overnight camping sites, and other recreation sites are managed without user fees currently on the forest. The forest currently waives fees at all Forest Service managed day use sites six days throughout the year.

The Forest reached out to local elected officials, tribes, and other groups/partners along with 7 media publications about how to comment on the fee proposal. Forest received 385 public comments. After reviewing the comments, the forest will be dropping the three OHV Special Recreation Permits sites and reducing the fee for the climbing permit from proposed \$100 to \$50 annual pass.

Public Participation Results

- Signs were posted onsite on August 13
- Forest posted fee proposal to their website, Facebook and Twitter messages starting August 1 and continued posting about the fee proposal throughout the comment period.
- The Federal Register Notice was published on August 15, 2022
- A press release was distributed on August 1 to all local media outlets and was published in the following:
 - KOIN – August 2
 - Estacada News – August 3
 - Willamette Week – August 3
 - Unofficial Networks – August 4
 - Salem Statesman Journal – August 4
 - Oregon Hikers – August 1
- Federal Legislators were briefed on August 1 including Senator Jeff Merkley, Senator Ron Wyden, Representative Greg Walden, Representative Earl Blumenauer, Representative Kurt Schrader, and Representative Cliff Bentz. To date, no comments have been received.
- Wasco, Hood River, Clackamas, and Multnomah County Commissioners were briefed on August 1 and follow-up emails were sent on October 14. To date, only one comment has been received from Wasco County Commissioner Kathy Schwartz and she is supportive of the proposal (October 18, 2022).
- Notice of proposal went to the Confederated Tribes of Warm Springs on August 1. Follow up emails were sent out to Tribal Representatives Robert Kenta, Christian Nauer, and Briece Edwards on October 19, 2022. To date, no comments have been received.
- Other Groups were sent notice of proposal on August 1:
 - City Representatives
 - National Forest Foundation
 - Stewardship Partners (Oregon Wild, Backcountry Horsemen, Northwest Youth Corps, Trail Keepers of Oregon, 44 Trails, Pacific Crest Trail Association, Motorcycle/ATV Clubs, Collaboratives)
 - Search & Rescue Partners and Mt. Hood climbing outfitter/guides: (Sheriff Offices, Crag Rats, Portland Mountain Rescue, Timberline Mountain Guides, Mazamas, Northwest School of Survival)
 - News outlets and other media

- Tourism (Boards, Mt. Hood Meadows, Timberline Lodge, Vista Recreation, Olallie Lakes Resort, Lost Lake Resort Inc., Portland General Electric Recreation)
- Special Use Permit holders including Outfitter & Guides, Organization Camps, and Recreation Events
- General Public via Email, Live Events, and Story Map
- Facebook Live Event including Climbers Virtual Town Hall was held on September 7, 2022. This public meeting was divided into two segments, with one dedicated to recreation site fee proposals, and a second Climbers Virtual Town Hall focusing on the Mt. Hood Climbing special recreation permit proposal. 32 – 35 participants attended, and comments are provided in Appendix A.

The Forest received a total of 385 comments (16 of the respondents commented multiple times and many respondents commented on multiple themes): 100 via email, 120 from the Facebook live event, 113 from the Climbers Virtual Town Hall Meeting, and 52 from story map. Comments are in Appendix A.

Changes to Fee Proposal Based on Analysis:

After reviewing the public comments, the Forest supports moving forward with dropping the three OHV Special Recreation Permits sites and reducing the annual climbing permit to \$50.

Overview of Fee Proposal

Site Name:	Site Type:	Current Fee:	Proposed Fee:	Changes to Fee Proposal:
Lolo Pass	Trailhead	\$0 per day	\$5 per day	
Little Fan Creek	Picnic	\$0 per day	\$5 per day	
Peg Leg Falls	Picnic	\$0 per day	\$5 per day	
East Fork	Trailhead	\$0 per day	\$5 per day	
Fifteen Mile	Trailhead	\$0 per day	\$5 per day	
Badger Lake	Trailhead	\$0 per day	\$5 per day	
Bonney Meadows	Trailhead	\$0 per day	\$5 per day	
Underhill	Trailhead	\$0 per day	\$5 per day	
Little Badger	Trailhead	\$0 per day	\$5 per day	
La Dee Flat	OHV Staging Area	\$0 per day	\$5 per day	\$0 per day
Rock Creek – Gate Creek	OHV Staging Area	\$0 per day	\$5 per day	\$0 per day
McCubbins	OHV Day Use	\$0 per day	\$5 per day	\$0 per day
Two Rivers	Campground	\$0 single site	\$10 single site	
Polallie	Campground	\$0 single site	\$10 single site	
Little John Sno-Park	Campground	\$0 single site	\$10 single site	
Keeps Mill	Campground	\$0 single site	\$10 single site	
Badger Lake	Campground	\$0 single site	\$10 single site	
Bonney Meadows	Campground	\$0 single site	\$10 single site	
Fifteen Mile	Campground	\$0 single site	\$10 single site	
Underhill	Campground	\$0 single site	\$10 single site	
Little Badger	Campground	\$0 single site	\$10 single site	
White River Station	Campground	\$0 single site	\$10 single site	
Trillium Yurt	Lookout/Cabin Rental	\$0 per night	\$100 per night	
Five Mile Lookout	Lookout/Cabin Rental	\$50 per night	\$85 per night	
Clear Lake Lookout	Lookout/Cabin Rental	\$50 per night	\$85 per night	
Mt Hood Summit Pass (above 9,500 ft)	Special Recreation Permit (Business Plan in Appendix B)	\$0 2-day permit \$0 annual pass	\$20 2-day permit/person \$100 annual pass/person	\$50 annual pass/person

Proposed Day Use - \$5 per day

Market Analysis - Other Providers

Dabney State Park Price: \$5.00

OR state park- picnic tables, grills, shelters, boat launch, restrooms, trash, river access

Link: <https://stateparks.oregon.gov/index.cfm?do=park.profile&parkId=110>

Sandy River Delta Price: \$5.00

vault, picnic tables, kiosks, parking, interpretive site

Link: <https://www.fs.usda.gov/recarea/crgnsa/recarea/?recid=29976>

Wildwood Recreation Area Price: \$5.00

BLM site-\$5 per vehicle, water, picnic tables, restrooms, trash collection

Link: <https://www.blm.gov/visit/wildwood-recreation-site>

Current and Proposed Fee Structure

From	To	Fee Per	Rate Per	Range of Current Fees	Proposed Fee	Group Size	Reservable
Jun 1	Nov 30	Day	Vehicle	\$0	\$5.00	1-4	<input type="checkbox"/>

Remarks: Annual Northwest Forest Pass and full suite of Interagency Passes will be honored

Fee Justification

Price is commensurate with the amenities and services provided and is aligned with comparable trailheads with similar amenities and services provided.

Amenities

Garbage receptacle, gravel parking area, permanent sign on kiosk or stand alone, picnic tables, respond to emergencies only, vault toilet, graveled access road, fee station, recreation opportunities adjacent

Planned Accomplishments

Primary Amenities will be added to sites where needed. Fee will not be charged until all amenities are in place.

Badger Lake
Barlow Ranger District

Trailhead

New Fee
Standard Amenity Fee



Total Operations and Maintenance:	\$1,617.90
Deferred Maintenance:	\$2,680.00
Current Revenue:	\$0.00
Predicted Revenue:	\$6,062.50

Site Description

Badger Lake Trailhead is situated beside Badger Lake at the entrance to the Badger Creek Trail. Visitors must take a long, rough road to access the trailhead, but it is popular nonetheless due to its proximity to the lake and numerous trails within the Badger Creek Wilderness.

Bonney Meadows Trailhead
Barlow Ranger District

Trailhead

New Fee
Standard Amenity Fee



Total Operations and Maintenance:	\$7,500.00
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$9,093.75

Site Description

Trailhead located on the outskirts of gorgeous meadows. The trailhead accesses numerous trails that are popular with hikers, mountain bikers and horseback riders.

***East Fork - Robinhood
Hood River Ranger District***

Trailhead

New Fee

Standard Amenity Fee



Total Operations and Maintenance:	\$1,454.06
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$7,275.00

Site Description

East Fork Trailhead is a parking area with a picnic table accessing the Southern end of the East Fork Trail. Development of this trailhead would provide more parking for access to the East Fork Trail. East Fork Trail ties in with Tamanawas and Polallie at its north end. This trailhead is less busy than Tamanawas and Polallie trailheads, providing an opportunity to disperse use as it is adjacent to the Hwy 35 corridor.

***Fifteenmile Trailhead
Barlow Ranger District***

TRAILHEAD

New Fee

Standard Amenity Fee



Total Operations and Maintenance:	\$1,413.50
Deferred Maintenance:	\$598.00
Current Revenue:	\$0.00
Predicted Revenue:	\$9,093.75

Site Description

Fifteen Mile Campground and trailhead is a very popular site accessing Fifteen Mile and Cedar Creek Trails on the east side of the Barlow RD. The campground and trailhead are full most weekends during the summer and receive regular use throughout season that it is accessible. The campground is located adjacent to Fifteen Mile Creek, one of the forest's Wild and Scenic Rivers.

Little Badger
Barlow Ranger District

New Fee

Trailhead

Standard Amenity Fee



Total Operations and Maintenance:	\$2,210.44
Deferred Maintenance:	\$3,800.00
Current Revenue:	\$0.00
Predicted Revenue:	\$3,031.25

Site Description

Accesses the Little Badger Trail which provides access to a larger trail system within the Badger Creek Wilderness.

Little Fan Creek

Clackamas River Ranger District

New Fee

Picnic Site

Standard Amenity Fee



Total Operations and Maintenance:	\$2,210.44
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$7,300.00

Site Description

Little Fan is currently closed. It was once a small campground. We would like to open it as a day use site.

Lolo Pass
Zigzag Ranger District
Trailhead

New Fee
Standard Amenity Fee



Total Operations and Maintenance:	\$1,210.00
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$3,031.25

Site Description

Lolo Pass Trailhead is a very popular parking area with a kiosk and garbage receptacle. A toilet will need to be installed at the trailhead.

Pegleg Falls
Clackamas River Ranger District
Picnic Site

New Fee
Standard Amenity Fee



Total Operations and Maintenance:	\$1,472.00
Deferred Maintenance:	\$140,000.00
Current Revenue:	\$0.00
Predicted Revenue:	\$8,760.00

Site Description

Pegleg Falls is currently closed. It was once a day use site. We would like to open as a day use site once again. There is a waterfall and swimming area.

Underhill Trailhead
Barlow Ranger District

TRAILHEAD

New Fee
Standard Amenity Fee



Total Operations and Maintenance:	\$4,900.05
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$9,093.75

Site Description

Underhill picnic area is located off Forest Road 44. This easily accessible picnic area has trail access and is a convenient spot for visitors to picnic or camp when visiting the Mt. Hood. A small mill was operated at this site in the 1930s. We would like to renovate the small picnic pavilion on site. This pavilion has been used for conservation education in the past.

Proposed Campgrounds - \$10 per night

Market Analysis - Other Providers

Smokiam RV Resort Price: \$10.00

Private: Fire Pits, Electricity. Hot tubs, pool, and sauna. Recreation clubhouse with pool table and TV. Laundry. Playground and mini golf, lake side (Soap Lake)

Link: <https://smokiamrvresort.com/>

Sixes Rivers Campground Price: \$8.00

BLM: Fire rings, picnic tables, nearby river access for swimming and fishing, NO drinking water, vault toilet

Link: <https://www.recreation.gov/camping/gateways/1861>

Halfway Flat Campground Price: \$10.00

FS: Host. Camp fire rings, hand pump drinking water, vault toilet, picnic table. Nearby river access

Link: <https://www.recreation.gov/camping/campgrounds/256348?tab=info>

Current and Proposed Fee Structure

From	To	Fee Per	Rate Per	Range of Current Fees	Proposed Fee	Group Size	Reservable
Jun 1	Oct 31	Single Site	Group	\$0	\$10.00	1-8	<input type="checkbox"/>

Fee Justification

The price is comparable to other sites within the market for like services and amenities. Having lower price point campgrounds create a variety of opportunities on the forest for overnight recreation.

Amenities

Fee station, fire ring, garbage receptacle, picnic tables, respond to emergencies only, vault toilet, gravel parking area, recreation opportunities adjacent, scenic view, site in good condition, tourism opportunities

Planned Accomplishments

Keeps Mill, Bonney Meadows, Fifteen Mile, Badger Lake, Little Badger, Polallie, Little John: No improvements are needed at these sites. All facilities are in very good shape. Underhill- the picnic shelter could use some maintenance and improvements including a new roof and paint White River Station- will need to replace amenities. Two Rivers- Will need to replace some amenities.

Badger Lake
Barlow Ranger District
Campground

New Fee
Expanded Amenity Fee



Total Operations and Maintenance:	\$2,499.69
Deferred Maintenance:	\$2,400.00
Current Revenue:	\$0.00
Predicted Revenue:	\$4,855.00

Site Description

Badger Lake is a popular campground situated beside Badger Lake, and at the entrance to the Badger Creek Trail. Visitors must take a long, rough road to access the campground, but it is popular nonetheless due to its proximity to the lake and numerous trails within the Badger Creek Wilderness.

Bonney Meadows
Barlow Ranger District
Campground

New Fee
Expanded Amenity Fee



Total Operations and Maintenance:	\$2,196.23
Deferred Maintenance:	\$867.00
Current Revenue:	\$0.00
Predicted Revenue:	\$5,826.00

Site Description

Bonnie Meadows is a popular campground located on the outskirts of gorgeous meadows. The campground accesses numerous trails that are popular with hikers, mountain bikers and horseback riders.

Fifteen Mile
Barlow Ranger District
Campground

New Fee
Expanded Amenity Fee



Total Operations and Maintenance:	\$2,471.29
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$2,913.00

Site Description

Fifteen Mile Campground and trailhead is a very popular site accessing Fifteen Mile and Cedar Creek Trails on the east side of the Barlow RD. The campground and trailhead are full most weekends during the summer and receive regular use throughout season that it is accessible. The campground is located adjacent to Fifteen Mile Creek, one of the forest's Wild and Scenic Rivers.

Keeps Mill
Barlow Ranger District
Campground

New Fee
Expanded Amenity Fee



Total Operations and Maintenance:	\$3,720.19
Deferred Maintenance:	\$875.00
Current Revenue:	\$0.00
Predicted Revenue:	\$4,855.00

Site Description

Keeps Mill is a small, 5 site campground on the Barlow Ranger District. The campground is the site of an old family mill and is located along the shore of the White River and within the Wild and Scenic River Corridor. It is surrounded by old growth ponderosa pine and popular with white water kayakers as well as other travelers seeking a location less traveled than some of Mt Hood's more popular spots.

Little Badger Campground

Barlow Ranger District

Campground

New Fee

Expanded Amenity Fee



Total Operations and Maintenance:	\$2,210.44
Deferred Maintenance:	\$3,800.00
Current Revenue:	\$0.00
Predicted Revenue:	\$4,855.00

Site Description

Little Badger Campground provides rural camping opportunities on the east side of the forest. This five-unit campground is well maintained and accesses the Little Badger Trail which provides access to a larger trail system within the Badger Creek Wilderness.

Little John

Hood River Ranger District

Campground

New Fee

Expanded Amenity Fee



Total Operations and Maintenance:	\$2,221.44
Deferred Maintenance:	\$3,504.00
Current Revenue:	\$0.00
Predicted Revenue:	\$4,855.00

Site Description

Little John SnoPark also has several campsites that are maintained throughout the summer season. These campsites are popular due to their location adjacent to Highway 35. They are close to numerous recreation opportunities across the forest. These sites also provide an option to visitors who are not able to find a spot at the more developed campgrounds along the Highway 35 corridor.

Polallie

Hood River Ranger District

Campground

New Fee

Expanded Amenity Fee



Total Operations and Maintenance:	\$2,385.44
Deferred Maintenance:	\$800.00
Current Revenue:	\$0.00
Predicted Revenue:	\$3,246.00

Site Description

Polallie Campground is located adjacent to the Polallie Trailhead and adjacent to the East Fork Hood River. The campground also accesses Polallie Trail. It receives regular use throughout the summer season.

Two Rivers

Clackamas River Ranger District

Campground

New Fee

Expanded Amenity Fee



Total Operations and Maintenance:	\$1,784.54
Deferred Maintenance:	\$18,094.75
Current Revenue:	\$0.00
Predicted Revenue:	\$6,492.00

Site Description

Two Rivers is a closed site that was once a walk-in picnic area. It is located at the confluence of the Clackamas and Collawash River. We would like to reopen this site as a walk-in campground.

Underhill
Barlow Ranger District

New Fee

Campground

Expanded Amenity Fee



Total Operations and Maintenance:	\$4,900.05
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$2,913.00

Site Description

Underhill Campground and picnic area is located off Forest Road 44. This easily accessible campground and picnic area has trail access and is a convenient spot for visitors to picnic or camp when visiting the Mt. Hood. A small mill was operated at this site in the 1930s.

White River Station
Barlow Ranger District

New Fee

Campground

Expanded Amenity Fee



Total Operations and Maintenance:	\$1,932.00
Deferred Maintenance:	\$1,925.00
Current Revenue:	\$0.00
Predicted Revenue:	\$4,855.00

Site Description

White River Station Campground is found along the historic Barlow Road and located along the banks of the White River. It is currently closed to camping. The site receives light to moderate use and has a pit toilet. Renovations would take place prior to reopening the campground.

Proposed Lookouts - \$85 per night

Market Analysis - Other Providers

Steliko Lookout Price: \$95.00

beds for all, lights, propane heater, fridge, furniture, device chargers

Link: <https://www.recreation.gov/camping/campgrounds/10132083?tab=info>

Lake of the Woods Lookout Price: \$65.00

1 bed, solar lights, propane heater, pit toilet, lighting, picnic table and fire ring

Link: <https://www.recreation.gov/camping/campgrounds/234158?tab=info>

Quartz Mountain Fire Lookout Price: \$79.00

WA State Parks- Propane stove, no electricity, vault toilet, fire ring & wood, propane stove beds and water pump, and 5-gallon drinking water. These range from \$79-\$99 per night.

Link: <https://www.parks.wa.gov/423/Mount-Spokane-State-Park>

Current and Proposed Fee Structure

From	To	Fee Per	Rate Per	Range of Current Fees	Proposed Fee	Group Size	Reservable
Oct 1	May 31	Night	Group	\$50	\$85	1-4	<input checked="" type="checkbox"/>

Fee Justification

The forest will implement a consistent Forest-wide fee structure. Recreation user fees at sites which share a similar a development scale, provide visitor services, and amenities available for use, will charge a recreation fee at common price point. Which is in-line with other outdoor recreation service providers, both public and private, featuring comparable provided services and facilities.

Amenities

Basic kitchen supplies provided (pots/pans/plates), capacity 1-4 people, propane lights/appliances, vault toilet, wood stove heat, firewood provided, gravel parking area, graveled access road, no fire device, no visitor protection, reservable, recreation opportunities adjacent, scenic view, site in good condition

Planned Accomplishments

With additional fee revenue the Recreation program will: maintain the site at a high standard for visitors, modernize the amenities provided for comfort and enjoyment at the facility, increase the presence of personnel at the site, and provide additional recreational and educational visitor information.

Clear Lake Butte Lookout

Hood River Ranger District

Fee Increase

Cabin or Lookout

Expanded Amenity Fee



Total Operations and Maintenance:	\$1,251.63
Deferred Maintenance:	\$0.00
Current Revenue:	\$8,054.00
Predicted Revenue:	\$11,276.00

Site Description

Clear Lake Butte Lookout is situated on the southern slope of Mt. Hood, providing spectacular panorama views of snow-covered treetops, alpine lakes, and rugged Cascade peaks. It also provides access to a variety of recreational opportunities, including fishing, hiking and wildlife viewing, as well as winter sports. The lookout can only be accessed by skiing, snowmobiling, or snowshoeing up to 4 miles from the parking area at the Skyline Sno-Park.

Five Mile Butte Lookout

Barlow Ranger District

Fee Increase

Cabin or Lookout

Expanded Amenity Fee



Total Operations and Maintenance:	\$7,546.94
Deferred Maintenance:	\$0.00
Current Revenue:	\$13,687.00
Predicted Revenue:	\$19,161.00

Site Description

Fivemile Butte Lookout is available for reservation year-round. It provides stellar mountain views and access to a variety of outdoor recreation opportunities, including hiking, mountain biking and wildlife viewing. During the winter months, the lookout is popular among hunters and winter sports enthusiasts. In the winter the lookout can only be accessed by skiing, snowmobiling, or snowshoeing up to 3 miles from the parking area at the Billy Bob Sno-Park.

Proposed Lookout/Cabin - \$100 per night

Trillium Winter Yurt

Zigzag Ranger District

Lookout/Cabin

New Fee

Expanded Amenity Fee



Total Operations and Maintenance:	\$3,542.52
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$15,975.00

Site Description

Trillium Lake offers many recreation opportunities to visitors. It is a scenic area people ski, hike, or snowmobile into. The yurt is located just off the lake in the Trillium summer overflow spaces. The site is 100 yards from a vault toilet, and 10 yards from a wood picnic table and fire pit. The yurt will be furnished with furnishings to include a propane fireplace, beds, seating, table, and propane stove. It is a shaded site with access during the winter for people willing to ski, hike, and snowmobile from the Trillium Sno-park.

Market Analysis - Other Providers

Cape Lookout State Park	Price: \$62.00
13 yurts, sleeps 8, fire pit, picnic tables, flush toilets, showers, trash	
Link: https://stateparks.oregon.gov/index.cfm?do=park.profile&parkId=134	
Olallie Lake Resort	Price: \$100.00
2 yurts, picnic tables, fire pit	
Link: https://www.olallielakeresort.com/cabinyurtrentalrates.htm	
Lost Creek Campground	Price: \$50.00
2 yurts, vault toilets, water, fire pit, picnic area	
Link: https://www.recreation.gov/camping/campgrounds/232838?tab=fees	

Current and Proposed Fee Structure

From	To	Fee Per	Rate Per	Range of Current Fees	Proposed Fee	Group Size	Reservable
Jan 1	Dec 31	Night	Group	\$0	\$100	8	yes

Remarks: Reservable through winter and spring months.

Fee Justification

The forest will implement a consistent Forest-wide fee structure. Recreation user fees at sites which share a similar a development scale, provide visitor services, and amenities available for use, will charge a recreation fee at common price point. Which is in-line with other outdoor recreation service providers, both public and private, featuring comparable provided services and facilities.

Amenities

Capacity 5-8 people, propane lights/appliances, propane/gas heat, vault toilet, gravel parking area, graveled access road, no visitor protection, reservable, recreation opportunities adjacent, scenic view, site in good condition

Planned Accomplishments

With additional fee revenue the Recreation program will: maintain the site at a high standard for visitors, modernize the amenities provided for comfort and enjoyment at the facility, increase the presence of personnel at the site, and provide additional recreational and educational visitor information.

Proposed Climbing Permit - \$20 3-Days and \$50 Annual Pass

Mt. Hood Climbing Permit

Zigzag Ranger District

Climbing Permit

New Fee

Special Recreation Permit



Total Operations and Maintenance:	\$150,807.00
Deferred Maintenance:	\$0.00
Current Revenue:	\$0.00
Predicted Revenue:	\$161,250.00

Site Description

An estimated 10,000 climbers climb Mt Hood annually, primarily during the spring and summer. The Forest Service is proposing a Special Recreation Permit (SRP) fee for visitors climbing above 9,500 feet in elevation on Mt. Hood. Under the Mt. Hood Climbing Program SRP plan, an SRP and associated SRP fee will be required for all use on Mt. Hood at or above 9,500 feet elevation within the Mount Hood Wilderness. The SRP fee component of the plan includes two summit permit options, a two-day permit, and an annual permit. The two-day permit provides access above 9,500 feet for a 48-hour time specified at the time of purchase and is expected to be the more common permit purchased by visitors. The annual permit will provide unlimited access above 9,500 feet on Mt. Hood and is expected to be more commonly purchased by locals who may backcountry ski/snowboard or climb Mt. Hood multiple times during the year. Business Plan located in Appendix B

Market Analysis - Other Providers

- Mt. St Helens Price: \$15.00
 new proposed \$20 daily 4/1-10/31 Quota system in place
 Link: <https://www.recreation.gov/permits/4675309>
- Mt. Adams Price: \$15.00
 new proposed \$20 daily no quota system, free under 16 years of age
 Link: <https://www.recreation.gov/activitypass/4280e9ae-d010-11ea-8e82-82c0c22bed90>
- Mt. Rainier Price: \$53.00
 \$53 annual fee 26+, \$37 25 and younger no day pass option: climbing fee paid online, permit issued in person to climber for each specific date range and part it is issued to
 Link: <https://www.nps.gov/mora/planyourvisit/climbing-fee-faqs.htm>

Current and Proposed Fee Structure

From	To	Fee Per	Rate Per	Range of Current Fees	Proposed Fee	Group Size	Reservable
Jan 1	Dec 31	Year	Person	\$0	\$50	1	No
Jan 1	Dec 31	Multi-Day	Person	\$0	\$20	1	Yes

Remarks: Multi-day is 2-day permit

Fee Justification

Prices are based on the amenities and services provided. They are aligned or below comparable climb programs with similar or better amenities and are in line with the services provided.

Amenities

Climber registration & information facilities, kiosk, climber information, paved roads and parking, restroom facilities, WAG bag human pack-out system, and financial support to search & rescue and partners

Planned Accomplishments

- Climbing Ranger presence on busy climbing routes to provide route, conditions, and weather information and assist with search and rescue operations.
- Provide education and enforcement of wilderness regulations, rehabilitate negatively impacted areas, and maintain trails.
- Provide WAG bags for all pass holders and continue enforcement of a human waste pack-out system to reduce human waste accumulation on all alpine climbing routes, especially on the south side routes.
- Assist with maintenance and management of a climber's route through the Timberline Ski Area, around summer ski and snowboard camp operations that define the route for climbers and minimize conflicts with permittee operations.
- Maintain a climber's registration area at the Timberline ski area including informational signage, condition reports, and a climber's registration station.
- Maintain climber's restroom in or near climber's registration area.
- Maintain consistent pre-climb information services verbally, by phone, and internet climbing reports.
- Utilize pass revenue to continue support of partnerships with Portland Mountain Rescue and the Hood River Crag Rats that voluntarily patrol the mountain climbing routes and assists in search and rescue efforts.
- Provide partnership support to the local area Sheriff's Offices that conduct search and rescues on the upper elevations of the mountain.

Appendix A:

Mt Hood National Forest Public Comments Received

Virtual Online Comment Map Comments:

1. Increasing a fee for this particular site is simply a money grab. The current fee should easily cover the propane that sustains the oven/fridge during the winter. The only other amenity is the portable toilet which does not require much labor to empty. The roads are plowed by volunteers in the winter, the Mt Hood Snowmobile club. Plus, it is staffed throughout the summer.
2. Increasing a fee for this particular site is simply a money grab. The current fee should easily cover the propane that sustains the oven during the year. The only other amenity is the portable toilet which does not require much labor to empty. The roads are plowed by volunteers in the winter, the Columbia Gorge Power Sledgers. It is already maintained and upkept by the volunteer group Friends of Fivemile Lookout. This lookout is very secure already with a gated road. The money being made is more than enough already. While raising the fee might make it easier to rent with less people trying for it, a better option would be to limit the amount of nights per reservation to allow more people to enjoy it. Right now, people are reserving it for 7 or 8 days straight and then selling parts of their reservation to their friends or hoarding days just in case. Increasing the fee really does nothing for this lookout.
3. I grew up near this campsite and have been camping up and down FS-44 for pretty much my entire life. I have never once ever seen this site utilized by anyone. Not saying it doesn't get used, but it seems ridiculous to me to charge \$10 to camp at Underhill. It is literally right off the side of the highway, and not very far into the forest. I believe this site should remain the way it is in hopes it will still be used by some. I think a fee will make it so people don't ever camp here. Worst case you guys could make camping free for those with a NW Forest Pass. I think this could apply to all your proposed fee changes including Bonney Meadows, Badger Lake, etc. I understand the need for fee increases to provide services, but these changes will deter many longtime local stewards of these sites. I hope you are able to make the right decision that doesn't negatively impact locals on the east side of Mt Hood.
4. You don't have an icon for the "TLL trailheads" so my comments are for climbing and TL trailheads. Which ones are included there? PCT? Timberline Trail? Timberline to Town? Etc. How do you plan to differentiate the climbers from the hikers from the biker from the tourists? Are you charging folks hiking the TLL trailheads, but not the bikers or the tourists and skiers wandering around the trailheads? Best clarify all that please.
5. So, I am the person that got funding and oversaw the construction of this yurt. Is it not still being managed as part of the concessionaire permit? Are you planning to charge for it in the wintertime? Is it still concessionaire in the summer? The list does not clarify, but this title says winter yurt. Please clarify. Why has it taken 7 years to be charging at this site? Is it the same yurt? Are you planning to have a wood stove (and wood storage nearby) for winter? Does that mean folks cannot come in and get warm in winter? Not sure how it has been managed in past few years....
6. I think some of these "campgrounds" are vestiges of dispersed sites, where we decided we needed a toilet for 3 or 4 dispersed sites - and bada bing we have a "campground" we have to manage. Either close these sites to camping or enlarge them to have at least 10-15 sites (especially in light of decreased capacity up 224). It is economically stupid to have less than 8 campsites and think you will collect enough \$ to pay for cleaning, maintaining and pumping. So, either enlarge it, or do what was supposed to be done, and close these small campgrounds, including dispersed camping.
7. I managed the MHNH Campgrounds and concessionaire program for many years. So, you evidently caved to concessionaire complaints to take this one off the list of concessionaire campgrounds. They will always be pushing you to remove the crap and keep the cream campgrounds. Why have concessionaires, if you continue to take the more challenging campgrounds off the list and manage them yourselves? Not that the FS can manage that scope given the screwed up seasonal hiring system in place. I feel so sorry for you all. Either add all these small east side campgrounds into the concessionaire permit or close them like they were supposed to be closed. See comments on Polallie about either enlarging a campground to at least 10 sites - or closing them and restricting dispersed camping. You have your hands full hiring enough summer staff to make progress on the huge trail backlog. Cut your losses. I get that there are a handful of folks that like to camp in some of these areas. But you don't keep a restaurant open with two tables. If a

concessionaire cannot keep some of these 3-4 site campgrounds going, why does the MHNF insist on trying to do it? Especially given there is more to manage, it costs more, and you have fewer staff. Either enlarge them and add to concessionaire permit or close them and decommission them!!

8. Hard to believe this was not raised years ago. When you have over 80% occupancy at a fire lookout, it is a safe bet to raise the rent. What are the costs associated with managing the program, firewood, toilet etc.? Figure that out and set the rates to at least cover those costs. I tried for years to get Barlow to raise it over the \$35 they were charging! Ditto this comment for all your fire lookouts!

9. Why would you want to open this as a day use area when it was a PIA to finally get it closed as a campground? It's not like you have the staff to keep folks from camping here in this "day use" area - wink wink. See comments on east side cg's. Either enlarge it to 10-15 sites - or close it and restrict parking, day use and dispersed camping. I thought we pulled the facilities out of there! It is not cost efficient to be managing a toilet etc. there with the small amount of \$\$ you might capture. Quite trying to do more with less!

10. See comments on Little Fan. When you cannot even manage Bagby - and you let the concessionaire off the hook and gave it to Rysavy, I cannot believe you are wanting to REOPEN a closed recreation site. How about get Bagby fixed up as we started to do in 2011? Rebuild the large bathhouse, replace all the cedar log tubs, dig out the presumably full pit toilets, and replace the water supply and drainpipes. Install some heavy-duty lockable water supply valve boxes to be able to shunt the water to the main stem from 10 pm to 8 am and you solve part of the crap show problem you have there. Install and maintain a locked gate during those hours at the 70-7010 road junction and that helps even more. The old log footings that held up Bathhouse #2 (where all the tubs drained directly onto the footings multiple times a day!!) were rotted to the hilt of the screwdriver I stuck in them on my first visit. I am sure Bathhouse #1 is no better. The supply and drainpipes need to be installed so they cannot be messed with by yahoos. Decommission anything at Pegleg - I thought we did that one too! And focus on Bagby! And I would not expect much from Rysavy. He was all hat and no cattle when it came to Bagby.... Concessionaires were collecting big \$\$ from there, but it is a problem spot if you don't enforce rules and restrict use after 10pm. He/she who controls the water spigots, controls the users. Good luck!

11. Hate to beat this horse - but just review the rest of my comments and JUST SAY NO to REOPENING small costly sites that will never come close to paying for themselves! How about focus on getting the existing campgrounds re-opened? At least the CXTs are still there. Fall the snags. Use some of the good cedars and doug fir to mill up wood for replacing Bagby structures. That is how we rebuilt part of Bagby in 2011-12. I am not sure who thinks re-opening these small sites is a good idea - obviously they have little experience managing a holistic sustainable recreation program. The condition of your existing recreation facilities is bad enough and I completely understand the challenge. I was at Little Crater, PCT and Timothy Lake Trail last week - and the boardwalk, benches, and bridges had huge rotten holes. Nothing had been done in these popular scenic destinations since I managed them 7 years ago. So please forget trying to add onto your already overflowing plate and focus your very limited time, staff and funds and get these important priority areas repaired and maintained!! Signed - Been there, done that. Closed them for a good reason!

12. People absolutely trash this site. I think having \$10 and the site ticket attached to their license plate for trash fines would be AWESOME. Especially if you are adding a toilet.

13. While this seems nice. Where is the cap? While \$20 doesn't seem like a lot of money to many. This disproportionately affects low-income climbers who have to pay to rent gear, take a bus out, and make the minimum wage. There should be an option for low-income first-time climbers to go for free. We already know you'll be rollin in dough, the only people who will be deterred from climbing are people in a low-income bracket.

14.

15. "I am in favor of a fee for climbing hood. I would only support it if there was, and there is, an annual option. Thanks for that.

16. I would love to see this money going towards a bathroom at timberline that can be used by climbers when the lodge is not open"

17. I support the new climbing permit fee structure as currently envisioned: \$20 for 2-day pass/summit attempt or \$100 for seasonal pass, 9500' threshold (unlike 9000' as I had heard) allows exemption for popular, safer backcountry ski

destinations (Illumination Saddle and Snowdome, for example). I also - most critically - like that there are NO advance reservations/quotas, both difficult for weather planning and which might push people who reserved in advance and thus inadvertently create rescue situations as people feel obligated to go when they would otherwise cancel. \$100 is fair for seasonal unlimited passes for locals and experienced folks. Money use seems fairly split bw stewardship education and enforcement and compensating rescuers, who do a great service.

18. This site should remain free. No one even knows you can camp here in the first place. If you make it have a fee, then people will come and trash the place. There is also no toilets, only one site has a picnic table...is USFS going to put these in if they have a fee? If there is a fee and no toilet, no picnic tables, this makes no sense.

19. No one comes here, it should not have a fee.

20. No one comes here, it should not have a fee.

21. No one comes here, it should not have a fee.

22. Fees at this campground seem like a good idea and I fully support the \$10 proposal. Will the sites become reservable online? Will discount passes (e.g. Golden Age) apply to the fees?

23. "Hello, I'm voicing my opposition to the proposed permit in its current form. Below is my reasoning.

-While I understand rescues have increased, permitting over 9500 feet will limit folks who want to recreate in areas like illumination rock that have many less accidents. Stationing climbing rangers in hot rocks/hogs back to educate and discourage climbers without proper gear would prevent accidents. At minimum the permit area should be modular and only cover upper climbing routes.

-Having paid permits for one day only can cause people to go when conditions are more dangerous due to investment in high permit fees for some. Permits should cover a range of days that they could access permitted areas when optimal conditions arise.

Fees should be lower to allow minorities and lower income citizens access to public lands."

24. Camping fee should only be for sno park season, not summer as little use of this site. I stop for rest stop use and rarely are campers there in summer. Who will collect fee, will there be a fee box for tweekers to bust open? If general public show up and needs to use internet to access payment, there are no cell bars this location. Should use time and effort to put emergency call box at this location, not waste time with silly fees for random little summer use site. Sorry, just don't get the logic in Region 6 on this one.

25. "Illumination Saddle is a common ski tour that takes folks to 9,543'. This tour is in no way impacted the way the Pearly Gates and Old Chute are, and it's ridiculous for folks touring here would be subject to the same \$20 summit fee for the privilege. You should raise the summit-fee threshold elevation to 10k' to allow for ski-touring on the upper slopes by folks who have no intent of summiting or clogging up the constrained routes above Crater Rock.

Other than this, I think the summit fee is reasonable, and would be useful if it supported better management of unprepared climbers attempting to summit, and more frequent conditions reports including climbing conditions and support for NWAC's avalanche hazard forecasting further into Spring."

26. How much of the \$100 fee for the yurt comes back to the forest service?

27. I disagree and oppose your fee and permit proposal. Adding yet another fee to public lands does not increase safety and will only further marginalize those who will have the inability to pay for the new permits. Please do not make any of the proposed changes to the current free, self-issue permit system.

28. I believe this would counter mind the snow park permit system.

29. "We need to raise the elevation limit to devils kitchen. We don't need backcountry skiers going for a ski to pay for permits- they're unlikely to require rescue on non-technical terrain and don't cause the same congestion issues as climbers.

We need to lower the daily and yearly fee for people. Economic barriers are real for folks and exclude already marginalized communities. This only perpetuates that. If we have a 2-day fee it should be lower than \$20. If we have a yearly fee, it shouldn't be twice as much as Rainier, which provides significantly more services.

I think we really need to listen to the idea that 2-day permits can incentivize people to try and climb technical routes in bad weather since that's their permit window. This would only increase accidents and rescues.

Otherwise, thank goodness that some of this money will go towards opening a bathroom year-round 24 hours a day. It's

absurd that this isn't already available at one of the most climbed mountains in North America."

30. I have stayed here, and it is worth the increased fee to ensure a well maintained and safe experience.

31. I have stayed at numerous fire lookouts from the USFS and I support this fee increase. It's a special experience that is worth the extra cost - given these sites' popularity and heavy use I'm willing to pay more to ensure they are well maintained and safe.

32. I am in favor of this fee. It is in line with what other land managers do - e.g., Mt. Rainier and Mt. Adams. This also seems like it would enhance safety.

33. Instituting new fees on public land goes against the entire point of making sure public land is accessible for all people. It was already bad enough when lost lake company was sold (long term leased) all of the recreational sites on the west side of the cascades. They certainly like to strut around and tell people what to do well outside the bounds of their lease. It would seem that they are getting to extract quite a bit of money from public land without paying back into it. Let the companies who lease public land pay for the repairs and additions to the sites they pull money out of every year. The burden should not fall on people who are already struggling just to get by. Let timberline lodge use some of the millions and millions of dollars they pull out of public land every year to improve roads and the accessibility to camp sites for all ability levels. Otherwise, why are these companies being allowed to profit off of public lands?

34. Little Fan should definitely be a day use site due to the great swimming and beach area. I would be happy to pay \$5 if this fee will actually be used to replace the terrible old toilet with a decent one which is maintained, to provide picnic tables as there seem to be none on site, and to provide a garbage receptacle and service. Since this site sees heavy use, it really needs to be cleaned and maintained regularly. I do not support this fee increase if it will not for sure result in a better maintained site.

35. Similarly, to Little Fan, I would only support this fee increase if it will for sure result in better and more frequent cleaning and maintenance of the facilities. I would suggest that it could potentially be considered to be restored as a campground instead of just day use to help meet the demand for developed campsites since so many campgrounds in the Clackamas River corridor burned in 2020.

36. It would be good to restore Two Rivers as a camping site to help meet the demand for camp sites since so many camp sites were burned in 2020. There used to be a fishing pier to accommodate disabled anglers at Two Rivers, but it washed away in the flood of 1996. Forest staff might consider rebuilding a fishing pier here at this site. I will support the fee increase if it means the toilet will be upgraded and actually maintained and stocked, and as long as there will be picnic tables and fire rings installed at each camp site.

37. "Please do not charge for climbing permits! The price will provide an additional barrier to entry for those with little means... younger folks, people of color, women, people with disabilities. If you're only appealing to rich old white men, this might be the way!

I also believe this will negatively impact climbing clubs like the Mazamas. Will the Climbing Rangers replace our valuable assists like PMR, whose members are also out on the mountain daily already? The fees are not necessary, and the proposed fees are too high. The "amenities" granted are worth the resources.

NO TO PAID PERMITS ON MT HOOD!!!"

38. "I agree in principle with the proposal (having a ranger on the mountain during a busy weekend sounds reasonable, sharing some revenue with Portland Mountain Rescue and others is also reasonable), I am surprised by the fee amount. \$100 for an annual fee is twice as much as for Mt Rainier (\$53 for a year)! Mt Hood is significantly smaller and less dangerous - why should it cost more to climb Mt Hood than Mt Rainier?

39. "I oppose the permitting system primarily because it caters to those who can afford it. Simply because there are people who ""can"" afford it due to Hood's proximity to major metros doesn't mean that we should eliminate the opportunity for those who have spent their money to acquire the gear to safely complete the climb.

In addition: the cost is quite high compared to other climbing permits in the PNW, the PMR and Crag Rats are a donation-based rescue groups (the funds wouldn't go toward rescues), WAG bags are ~\$2-3 each and could be offered for purchase, and the rangers wouldn't be available to discuss safety when climbers are starting the route in the early morning hours.

On the surface it sounds like the permits are an attempt to increase safety for those who are unaware of the specifics

around rescues and ranger working hours, but once you look under the hood it's an attempt to restrict this classic Oregon (and PNW) climb to those willing to pay the fee. "

40. "Why would you impose such a high climbing fee for Mt. Hood? Rainier's ANNUAL fee is \$53 per person 26 years and older / \$37 per person 25 years and younger (<https://www.nps.gov/mora/planyourvisit/climbing.htm>).

That fee also goes toward actual rescue and removing human waste for a 2-day climb. The average household income in the nearest city (Seattle) is also much higher than Portland.

Shasta's 3-day pass is \$25 and \$30 for an annual pass (<https://www.shastaavalanche.org/page/climbing-mount-shasta-regulations>).

The America the Beautiful pass (for all national parks) is \$80 annually (<https://www.nps.gov/planyourvisit/passes.htm>). Cost alone seems prohibitive and quite high when comparing to nearby climbs and permits. "

41. The proposal to require a fee for climbing would further widen the outdoor accessibility gap. Outdoor activities, climbing and mountaineering in particular, have historically been dominated by white and wealthy men. Barriers are abundant already: gear, education, transportation to name a few. Adding one more layer and at such high cost would increase the barrier even more. The mountains have been here for millennia and it's not up to any organization to control who can and cannot use them and how. Public lands should be for all, not just a handful of wealthy people. Search and rescue have historically been volunteer based in the area and is one of the most well regarded programs in the nation. That is not changing and does not require a fee - just ask any SAR group who are actually out there rescuing people. I have climbed Hood a few times and never have I seen a climbing ranger. This is an absurd proposal to try to make money off of a few, while excluding many many others from the sport and mountain we love.

42. "I am opposed to this permit fee for several reasons.

- 1) it is not in line with similar fees in the region (\$30 for Mt Adams, \$50 for Mt Rainier)
- 2) It is an unfair financial burden for people with lower incomes
- 3) The amenities this could fund are not well-defined and should be described in more detail before implementing any sort of fee"

43. "I'm writing as a member of the local climbing community, Portland Mountain Rescue Board member, and volunteer Climb Leader with Mazamas. This climbing permit proposal is poorly researched, poorly reasoned, and has an outrageously high annual fee. I respectfully submit my comments for public record and urge the review board to reconsider the roll out, goals and costs proposed.

The \$100 annual fee will increase barriers to low-income folks. There is NO comparable fee for this in the Pacific Northwest- current annual fees in the area are Mt Shasta (\$30 for annual), and Mt Rainier (\$53 for an adult for annual). The services provided for Mt Rainier are significantly more substantial (stationed Climbing Rangers at high camps, removal of human waste, paying for rescue helicopter rides within the park). During the public information meeting on Facebook, the justification for the price stated by USFS was that ""well, Portland is a big metro area"". This discriminately prioritizes those with disposable income. I am concerned that Portland Mountain Rescue's efforts to recruit diverse candidates to our group will be undermined by only the wealthiest being able to pursue multiple climbs.

One of the justifications given for the proposed fee is that there is an increase in rescues due to crowds on the mountain and need for climber education. The current proposal does not include a limit on the number of climbers per day the permit will be issued. How will this decrease congestion? Only by pricing out low-income climbers. Accident reports don't indicate that congestion is the source of recent rescues. The last 20 years of accident reports don't give evidence of anything more than a single person or single rope team falls. There is a perception that the mountain is more crowded, but a comprehensive daily use planning study has not been completed or shared with the public. Data should be collected and analyzed before proposing this change.

It is not clear that the USFS is aware of existing climber education programs (from PMR, Mazamas, or NWAC), or the times when most climbers are on the mountain. As part of the proposal for new climbing rangers, the information session stated the rangers would not be working outside of 9am to 5pm normal hours for ""work life balance"". Any USFS climbing ranger staff hired should be expected to be on the mountain on busy spring weekend days and at times when climbers are climbing- the early morning hours. If education and outreach is the goal, this should be prioritized. I again urge you to reconsider the proposal."

44. I don't mind a modest fee for maybe a reliable bathroom at Tline that's open at 2am and a porta potty is fine. But \$20 a climb or \$100 a year is economically impossible for way too many of us. Even Rainier is only \$53. Just another way of making outdoor activities out of reach except to the wealthy. This makes me so sad and angry to have yet another barrier to those of limited means. If you say some of the funds will go to support SAR then I think some should actually go to Portland Mountain Rescue and the Crag Rats. Not just to another government employee.

45. I agree with fee proposal. The entire Clackamas drainage has over the past several years turned into a Wild West of destruction and trash. On any given day before the Riverside fire, you could find active violators of littering and destruction of nature. The fee proposal needs to contain ACTIVE DAILY ENFORCEMENT in order to be effective. I would also recommend banning target shooting in these zones. The area in general needs to have better enforcement since if an area is closed users will simply camp in areas outside the closure in effect perpetuating the current issues. Please also address 'permanent' residence inside and outside of recreation boundaries. Consider using some of the Riverside recovery funds to fund patrol and enforcement - otherwise this area is at risk of becoming another man made burn due to human disrespect or carelessness. I've been exploring this part of the Mt Hood National Forest since the 1970's and appreciate the current attention to resolving issues of disrespect to nature. Thanks. Jeff

46. I agree with the fee. Of note regarding this site is overcrowding and street parking. Please consider what a potential number of campers per site may be - otherwise it's a party zone. Again - none of these programs or fee collection will amount to anything if resources for enforcement are not addressed.

47. "This proposal does not have our safety in mind and will further exacerbate inequities in outdoor recreation. Justification for this fee is an increase in rescues due to crowds on the mountain and need for climber education. There is no limit on number of climbers allowed.

1. The money from Climb Fees is going to the USFS, not to any of the relevant groups that handle rescue (County Sheriff, PMR, Crag Rats)
2. Choosing to limit climbers by creating financial barriers has inequitable implications on low-income individuals and underrepresented groups
3. Discriminately prioritizes those with disposable income; generally, the people with limited skill and experience that are more interested in a once in a lifetime experience and represent a large number of rescue victims fall within this group.
4. USFS states they will use money to determine ways to educate the public. Climbing rangers don't work in early AM when people are climbing and will not be there to advise people when they are engaging in dangerous climbing practices
5. Permits create a well-known scarcity heuristic trap whereby people are more likely to go in marginal conditions or continue on when they should turn back because they've already invested something in the climb
6. People who think they've paid a fee to cover their rescue (note: this fee does not cover rescue) are more likely to engage in dangerous behavior that leads to injury

I appreciate you taking the time to read and consider these points. "

48. "I strongly disagree with the proposal to implement a climbing fee on Mt. Hood, for multiple reasons.

1. The justification for the fee does not make sense. The first justification bullet point mentions, ""increased technical search and rescue operations"", but these are not performed by the Forest Service - they're performed by volunteer organizations like PMR and the Crag Rats. These organizations have shown themselves more than capable of handling the volume of rescues on Mt. Hoods, yet none of the income from the fees will support them. The second bullet mentions paying for additional rangers to patrol Mt. Hood to address multiple issues, but frankly, the existing rangers do not perform these functions. In the one instance I interacted with a ranger on Mount Hood, I was only asked to show a permit. I was not educated on impact reduction, or any other matter. As noted above, rangers do not currently participate in rescues. Given that rangers do not currently perform any of the functions listed in the justification, why should we expect, that additional rangers will help address any of these issues?
2. Given that the justification does not make sense, the only logical conclusion is that this fee is being used as a general fundraising mechanism for MHNH. This may very well be justified, but if it's the case, then a) that should be explicitly stated in the justification for the fee instead of the dubious justification that's been provided, and b) the fee increase should be implemented as broadly as possible across the forest (e.g. by increasing NW Forest Pass fee) rather than forcing climbers to bear the majority of the burden.

3. The fee is excessive compared to all other climbing fees in the PNW. Mt. Rainier's climbing cost recovery fee is \$53, Mt. Adams day pass is \$15, Mt. Shasta is \$30 for an annual pass. Of note: Rainier's cost covers all rescues including helicopters, staffing rangers at two high camps 7 days a week during climbing season, and waste removal via helicopter from high camps. Why is Mt. Hood's proposed annual fee nearly double this, despite covering none of the above?
4. The fee exacerbates inequality in the mountaineering community and harms underrepresented groups. In an era where we as a community are trying to address inequality and bring more underrepresented groups into the climbing fold, this fee will serve as yet another barrier to entry."

49. "I understand the desire to have a permit fee. however, it does contribute to the already existing social disparities in climbing. Personally i want to see more diversity among climbers, and have opportunities for those who are less privileged economically.

Also, given that all S&R is performed by sheriff's departments and volunteer organizations, how is USFS going to get involved/support these efforts. Will a % of the permit feeds go to PMR and Crag Rats? how much?

\$100 seems like a lot for an annual permit: it is double what Rainier costs, and triple what most of the other cascade peaks are.

I would expand the permit window to 3-4 days to encourage climbers to delay a few days if weather isn't favorable. a 2-day permit doesn't allow much of a delay and given the huge snow loads hood receives won't allow time for a snowpack to settle. Shasta is a 3-day window, and they don't have as bad storms as we do. I'm concerned that climbers will still feel pressure to go up on mountain during their permit because they have spent money.

50. "Hi, thanks for the opportunity to comment on the proposed Mt. Hood climbing permit.

I oppose the permit as proposed. I believe the cost is exorbitant and the benefits are not clear enough.

I am a frequent Mt. Hood climber and PMR member.

My understanding is that the permit is intended to reduce crowding and improve education. While crowding on the mountain can be a frustrating experience, the data do not suggest that crowding is a significant cause of accidents in itself. Similar to other locations, accidents seem to be mostly related to slips on snow, equipment failure, and lack of experience. Furthermore, I do not believe that the climbing fee is an effective or equitable way to address crowding. On the Education side, I think that the dangers of climbing Mt. Hood are very well publicized by existing signage, PMR social media posts, and general media coverage. I do not think that additional signage or social media posts would deter inexperienced climbers who are committed to summiting. To be effective, there should be a friendly person stationed either at Timberline Lodge or higher on the mountain between 11PM and 6AM to chat with climbers about their plans on their way up. It doesn't sound like staffing during those busy hours is part of the plan though, so I doubt that there will be a noticeable impact on climber education. It would be helpful to see some prototypes of what a USFS education effort would look like using the existing climbing ranger and resources before asking the climbing public for more funding.

In addition to restricting access for lower-income climbers, I am concerned that the climbing fee will create an incentive for climbers to continue climbing into marginal conditions rather than turning around and trying again a different day. We see that psychology play out on other mountains, and so far, have been fortunate to not deal with many overly-invested climbers on Mt. Hood.

I largely agree with the points raised in PMR's comment letter to the USFS, but I believe that with the number of issues left to be addressed, the permit needs to be sent back to the drawing board.

Thanks for your consideration,

51. Please see the attached PDF containing my comments. Thank you.

52. "I am writing to comment on the proposed Mt. Hood climbing permit fee of \$20/\$100. I cannot support this fee with the limited to non-existent budget information provided.

I see no basis for the amount proposed. The Forest Service website states "Proposed fee prices are based on a market analysis of similar sorts of opportunities within Oregon and Washington" but I do not see that this market analysis is available for public review. I am quite curious what other climbing opportunities in Oregon and Washington cost \$100 per year.

The comment site states, "The proposed fee would allow the Forest Service to support our partners involves with search and rescue efforts, provide each permitted climber with a waste disposal bag to reduce backcountry impacts from improper waste disposal, and regularly patrol popular climbing routes during the primary climbing season." I do not see a proposal as to how the Forest Service will support the volunteer search and rescue partners currently operating

on Mt. Hood, nor do I see a budget for regularly patrolling popular climbing routes. One WAG bag per climber is only a dollar or two.

It is my understanding that federal agencies cannot operate at a profit and that all funds taken in must be budgeted and utilized. Therefore, a proposed 2024 budget and spend plan must have been formulated in order to determine that a \$20/\$100 fee was necessary to support volunteer search and rescue partners, WAG bags, and regular patrols of some routes. Please make this budget available to the public so we can better determine if we agree with this fee or not.

With the current lack of information, I do not agree with this proposed fee.

Thank you,

Email Comments:

53. The critical hazard on the South Side upper routes on Hood is the sheer number of people, many of which are very inexperienced and who do not give the mountain the proper consideration for the very real threats those upper slopes can produce in non-prime conditions.

ALSO, 20 dollars is excessive in the extreme for a summit pass - compared to similar mountains in the area. This isn't Mt. Rainer; it is an 8 to 10 hour climb for properly conditioned and skilled mountaineers.

So, it sounds like you aren't intending on limiting the number of climbers on Hood during peak months but instead intend on cashing in on the number of climbers with a complete disregard for their adept ability to travel into objective danger and then put themselves AND others into subjectively hazardous situations... way to be a government organization.

The South Side is a xxx show and you know it - this is no way to remedy that. You need to LIMIT the number of passes issued and not try to leech so much money from suckers eager to get hurt.

So way to go - follow the sisters' example and drive more and more respectful, dedicated and inspired climbers, backpackers and hikers who respect nature out of the forest and off the mountains. Give it to the idiots to trash - just make sure you charge them as much as you can.

Why don't you use all the money for your fees to put in a xxx Starbucks in the summit?

54. I love the idea of a climbing fee above 9,500ft, and I think it will do a lot of good for the environment to have new bags instead of the blue bag system. If the proposal went through would the newer bag system be in place come 2024 when the permit is required? Although this would require money up front, I believe it would be received better by the community to have the new bags and displays for them to see WHY things needed to change. Will the new Trillium yurt be available for rental in winter? We already have a lot to coordinate on the upkeep of shoveling one yurt out during the winter months.

Lastly, I see that Pegleg Falls will be open as a day use site for a fee. Will the bathrooms that are currently in use be revamped, and the camping spots be taken out? Would that gate swing open for parking down there instead of the congested parking issues we get now?

55. I think the \$5 increases are quite reasonable; the zero to \$10 seem steep. I worry about low-income people trying to get sites and they can no longer access them due to cost; everyone deserves access to nature.

I also feel like it would just be easier to buy a whole season pass rather than individual site passes.

I think OHV sites should have a much much steeper price increase as they are so destructive to the land, fauna with sensitive ears, flora and other human beings in the area. Allowing OHV is a terrible idea & should never have been allowed but I know it isn't going away.

Are any indigenous tribes of the area included in any of these policy decisions? according to the USDA website: "The Molalas, Kalapuyans, Chinookan Clackamas, Shinookan Wascos, Northern Paiute peoples, and Sahaptin speakers all lived within the area and many of them called the mountain Wy'East. This name has continued to live on in the community through names of streets, businesses, and schools. Native American trails would later be used by pioneers, rangers, the recreating public, and automobiles as well. With the movement of pioneers to the newly settled West most Native American tribes were forcibly moved to reservation lands."

56. I am completely in support of the proposed changes that include new, increased fees at recreation sites and for certain recreation activities. These changes will definitely help improve and maintain recreation facilities, routes and help

create new opportunities! As long as there's accountability to the new revenue and the proposed changes are actually implemented well, I fully back these new charges.

57. I am writing with great disappointment about your plan to add fees and regulations to climbing and recreation areas throughout The Mount Hood National Forest. Many of these sites are sites that we already pay a fee to access (sno-park & NWFS pass). It seems unreasonable to add another fee to these areas. Additionally, sites like Badger Lake trail are nice locations because they are low-key easy backcountry access. Adding a fee will mean we will either a). Pick a location that hasn't been permitted yet or b). Park further down the road where a permit isn't required and walk a little bit more to access the trailhead. Additionally, for many of us who backcountry ski and snowboard, we go above the proposed elevation frequently when leaving the resort, even when we have no intention of trying to summit. Also, we have incredible mountain rescue volunteers with PMR and The Crag Rats. We do not need climbing rangers who will be less trained, less effective, and more expensive. If you need revenue, consider adding permits for those who are outside of Oregon that visit our mountain. We already pay for access with both taxes and other permits. Please do not add additional fees and regulations to something that is already a pay site with enough regulations.

58. Hi there, I've grown up in Oregon my whole life, and spend quite a bit of time at Mount Hood weekly and for over 30 years. I'm not someone who generally thinks it's a good idea to charge fees, I hate taxes, and especially charging fees to residents, but, after reviewing what you guys are planning and seeing that the forest pass works, I just wanna let you know I fully support your proposal. I've also been concerned about people climbing up Mount Hood and needing to be rescued all the time, and increasing in frequency, it's pretty frustrating, and I think people are pretty ignorant in their decisions and they don't have respect for the mountain, so I'm really happy you guys are considering educating people because it seems like it's a lot of out of towners doing these things. Although I know some locals screw up as well. Along with a permit it would be a good idea for them to pass some sort of basic knowledge test, Anyways I just wanted to show my support for this proposal I'm sure you'll get a lot of negative comments because people don't like change but as long as I still have access, and we can increase education and respect for these beautiful places, I think this is a wonderful idea.

Thanks for all your hard work and I know I will always do my part to be a good steward of our beautiful forests and mountain.... But I was blessed to grow up here in Oregon and had the outdoor education that they provided us as well as was a girl scout and campfire and got introduced to it at a very young age, and I just don't think everyone has that sort of benefit or awareness so I really appreciate what you guys are doing and really look up to all of you for doing this job. Thank you

59. Mt Hood's nonprofit ski area, Teacup Nordic, wishes to support proposals like this that aim to improve USFS's service to the public. Mechanisms that improve safety and further accommodate those enjoying Mt. Hood have been postponed for too long; improved stewardship of the mountain is essential to ensure kids can enjoy the same outdoor beauty as their grandparents!

60. I am against charging additional fees. You say it is because you need the money. What have you done with the appropriations you have received the last 3 years when you have not been providing the services that you were before? What about 3 years ago when you almost completely shut down the forests and did not provide hardly any services. You should have excess money from those time.

The forests belong to the people. You should not make it difficult for the people to access the forests.

61. I strongly oppose the Permit and Fee proposal. Access to our public lands is difficult enough without the added paperwork and financial cost burden.

Our public lands should be free to use - both free as in freedom and free as in no financial cost. Any barriers to entry go against the goals of providing access to the public.

Specifically, I oppose the use of these fees to add rangers to support the program. I do not believe additional rangers are needed. If additional fees are needed to support search and rescue operations and / or USFS infrastructure, I suggest seeking efficiencies in other areas. Events to support the nonprofits who perform search and rescue would be well received by the community. Mandatory fees are not the answer.

The climbing community is active and wants the best for the land. Involve them, do not dictate their actions.

62. As a lifelong hiker and camper in the area, I support adding fee sites within the Mt. Hood National Forest and building a rental yurt at Trillium Lake. I would hope that this will not drive up the costs of the NW Forest Pass, and the proposed rental fee of \$100/night in the yurt seems unduly high. I support adding climbing fees as well and wonder if those could be used to offset rescue costs when necessary.

63. Thanks for the heads-up! Are the trailhead additions (e.g., Lolo Pass) basically new Forest Pass sites? For example, in this case nearby Top Spur is much more heavily used but is already a NWFP site, so thus my assumption. Also, in the case of the campgrounds listed, I'm seeing a couple (Polallie and Little John) that aren't formal campground now, but in the case of Little John, do experience dispersed camping. Are they envisioned to become formally developed campgrounds as part of becoming fee sites?

- Comment Back from Forest Service: Good questions. Yes, the trailhead additions would become new Northwest Forest Pass sites where either a 5-dollar day use fee would be required or an annual pass (or any of the other interagency passes). At these sites we would also provide all required amenities – toilet, signage, picnic table and trash service to name a few.
As for the campgrounds – on the east zone where all but two of the sites are, the infrastructure of the campgrounds are already in place except fee tubes. We already have picnic tables and fire rings and site posts at Little John and Polallie for example. We are already servicing these sites as campgrounds as well. We visit the sites at least once weekly to clean bathrooms, etc. Moving forward, folks would be required to also pay for these sites overnight. The fees would help us pay for this work as well as the staff required to do it. We also have sites where we want to make improvements - like Underwood Picnic Area. There is a shelter there that needs significant repair. Requiring a fee there would help us to reinvest those fees into improving or replacing the shelter. Thanks for reaching out. Let me know if you have any other questions!
- From Commenter: Super helpful! I do have a follow question: are trailhead and campground fees collected within MHNH actually retained to support sites within MHNH, or do they go to the region level (or higher?) and allocated more generally by formula across multiple forests? I've always assumed the latter, since NWFP is not forest-specific and can be purchased and used throughout Region 6, but maybe I have that wrong on that?
- Comment Back from Forest: Good question. 95% of the fees are retained on the forest. That other 5% I believe goes to the Washington Office to manage the program nationally. If someone purchases a day pass or an annual pass at one of our offices, it's tracked as being a pass purchased on Mt. Hood. The same applies at our fee sites where we have fee boxes (like Tamanawas) or where we have digital passes. When it comes to retail locations that sell passes, they get the passes from an employee on a specific forest and that forest receives the funds from passes sold at that retail location. For example, the passes sold at the retail locations along the Highway 26 corridor – Sandy, Gresham, Government Camp – those funds go to the Mt. Hood. The retail locations in Hood River – those funds go to the National Scenic Area. All Mt. Hood Climbing permit fees (95%) would go directly to the Mt. Hood National Forest. I'm a proponent of the program for that reason. I wouldn't be as much of a proponent if we didn't see the fees that get charged to our visitors return to be reinvested in our sites. In addition to supporting and improving infrastructure, they help with staffing. Our trail crews and developed recreation seasonal employees are supported with these funds. Without the fees, we wouldn't have these crews. Happy to talk more if you have other questions!
- From Commenter: Thanks! Again, super helpful. I've been an advocate at TKO for recreation fee systems, so this helps me respond to a couple of the most common arguments against them (money not staying local and/or not going directly back to trails). There are some other points that I've advocated for TKO's position on fees: (a) that there be some sort of equity provisions to ensure that fees don't become a financial barrier to visiting a site, (b) unified fee systems across public land agencies in places like the Gorge, and (c) that fees or timed permitting be used to manage peak demand at crowded trails. Just FYI,

as I'm hoping to write a letter of support for the TKO board to consider, with these as management practices that we would also support. It's a polarizing subject among hikers that we're trying to become better advocates for – and even the board struggles with it!

Thanks again for your time, Claire – much appreciated!

64. My feedback is specifically in regard to Mt Hood Summit (above 9,500 ft):

While I know we have seen a lot of accidents and inexperienced climbers on the mountain over the past year, I do not see a permit system as limiting to those individuals. My worry is that individuals who purchase a permit may experience "summit fever" and feel justified in not turning around because they have now placed a monetary value on summiting. For example, with Mount Saint Helens permits, despite the weather you will see climbers go for the summit because that is the only day, they have a permit for. I think the system will take away the ability to make smarter decisions based on weather (or personal factors) and we could potentially see more accidents.

Along with that, would we additionally require an individual to check for permits, like on Saint Helens? Could these accidents be mitigated by having someone at Devil's Kitchen keeping an eye on individuals? I think there may be a different solution that we haven't thought of.

In general, I am not a fan of adding fees, as it limits individuals access to the outdoors. These activities already have a large barrier to entry, and I think this only adds more of a burden on the individual.

65. Attached are the official Hood River Crag Rat comments on the proposed fee structure for climbing Mt Hood. This email was originally sent to Meta Loftsgaarden in July and she requested we resubmit it during the public comment period. Please let us know if you have any questions or the attached document didn't come through. (Attachment Below)

66. Your proposal to increase fees leaves me very dubious of anything actually improving. The company used to manage campsites on the MT Hood NF does absolutely nothing to improve amenities with the fees they already rake in. When I visit Bagby hot springs, I have to pay a fee to a third party to use my public land, then I have to spend a couple hours jerry rigging a bunch of pipes together just to get a little hot water into a tub. This management company didn't build the hot springs bath houses, they don't maintain these facilities and expect people to shell out money for doing absolutely nothing. The money does not go back into the community, it lines the pockets of managers and CEOs of the management company which is located in California for Christ's sake! I refuse to pay more money to get a little maintenance when this company should be doing that with the money they already are making.

Mt Hood National Forest is a wild place. Paving more roads for people to access more and more areas in the forest is not proper management. The forest is not just a big giant park. It is a home for wildlife. Areas need to be left wild. The forest is more than just trees and bushes, it's also the animals and fish that call the area home. Allowing more and more people to access remote areas more easily only contributes to the decline of wildlife. It disrupts their ability to successfully create offspring, it damages the areas these animals need to feed at, disrupts migration patterns and leads to an overwhelming amount of garbage left behind by careless and uneducated people who don't know any better. Why not put-up educational signs at campgrounds so people aren't left with a "Anything goes" mentality? This should already have been done with my tax dollar and recreation fees. Clear Creek Campground has very large, beautiful trees, most of which have been hacked at by idiots with hatchets leaving scarred and damaged trees for everybody to see for centuries to come.

Putting a porta potty on some damaged logging road near a trailhead does not justify charging more money. Maybe if you put up educational signs saying things like "Don't take a dump behind a tree two feet off the trail and bury your waste instead of leaving a charmin flower for everybody to see" would be worth spending a few extra bucks for but I doubt that will ever happen.

The single recreational group that does the most damage to the forest already get a free pass to do whatever they want, leaving garbage everywhere, and destroying resources at an unprecedented rate is the Target shooting community. They are given free reign of the forest and are expected to have ZERO responsibility. Why not charge them for a permit and make them carry fire extinguishers, shovels and a map of where they can and cannot target shoot at because these guys are using trailheads and public roadways as ranges endangering everybody who enters the forest. Why do I have to pay more money to use a campsite just to pay for THEIR stupidity? I found a shot up target sitting in the middle of the road going up Bonney Butte just last week! SOMEBODY WAS USING THE ROAD GOING UP BONNEY BUTTE AS A TARGET RANGE! SHOOTING DOWN THE MIDDLE OF THE ROAD!

The forest has already been mismanaged. giving more money to the company that mismanages it is not a proper solution. It only rewards their incompetency.

67. As a regular visitor to Mt. Hood National Forest, I am so disappointed in the proposed fee hike. Once again this will gentrify our national forest. We are finally hearing from the science community on the actual physical and mental benefits of being out in nature, and this fee hike will create an obstacle for many who truly need to be outdoors and are struggling with their finances. I know the State of Oregon has the ability to be way more creative in finding funding sources that spread the responsibility for our forests to everyone. Mt. Hood National Forest benefits our entire state, entire community. I have worked with indigent clients, encouraged them to go to the forest and enjoy some time in nature. This makes it even more difficult Please do not do this. I have family member who struggle just to put food on the table. They love the outdoors, and those \$5 fees add up more than you may realize.

68. In 2012 the U.S. 9th Circuit Court of Appeals ruled that the U.S. Forest Service cannot charge for hiking, walking, picnicking or visiting undeveloped areas of national forest land. In the unanimous ruling in favor of four hikers who had "standing" and objected to paying a fee to visit the forest, Judge Robert Gettleman wrote: "Everyone is entitled to enter national forests without paying a cent." The court reversed a district court ruling, saying the federal authorities violated the 2004 Federal Lands Recreation Enhancement Act (FLREA).

http://www.whittierdailynews.com/ci_19974329#ixzz2adOK51e8

Oregon is in the 9th Circuit Court thus, case law has ruled that charging a "fee" to merely hike/climb such as Mt Hood, an undeveloped area, would be in violation of the Recreation Enhancement Act under Federal Law. Have you run this "fee" proposal by the U.S. Department of Agriculture Office of General Counsel (OGC) and if so, why not make their advice public?

You mention that "95% percent of the revenue from recreation fees remains on the forests to operate, maintain, and improve facilities." I assume that Recreation.gov will be the conduit through which one will pay their fee, a private for-profit corporation, and a monopoly. Am I to assume that Recreation.gov will only get a 5% cut of the fee? Last year more than half the people who bought Central Cascades Wilderness Permits before the season started never showed up to hike on quota trails thus denying thousands of Americans access to their public lands while Recreation.gov and the forest service kept their fees. Your business model of providing less service while at the same time charging more harms your credibility and will not end well.

<https://www.opb.org/article/2021/09/22/wilderness-permit-central-cascades-no-show/>

I wonder how many Americans are aware of this private/public partnership and if so, how many would support it! Your proposal stated: The proposed fees were determined through extensive market research on similar amenities provided by state, local and private entities as well as comparable sites across our agency.

In other words, you are charging a fee based on "market research" for access to public lands which are owned by all Americans and maintained by our tax dollars. Your fee proposal is based on what visitors are willing to pay with NO correlation as to what it actually costs to manage a specific resource. If forest management starting with the Chief, Randy Moore used their limited budget in an efficient manner there would be more than adequate funds to manage the forest. To say the U.S. Forest service is "top heavy", too many chiefs and few/no Indians is an understatement. One GS-13 pay, and benefit package would fund at least 6 seasonal wilderness rangers. How many GS-13 does the Mt Hood National Forest have? I would guess at least twelve GS-13s. No wonder there is not enough funds for forest service personnel to disseminate information to visitors and for on the ground management of recreation areas. This year's discretionary budget for the Forest Service is \$5.7 billion, an increase of 6% from the previous year.

I understand that for the Forest Service to enforce federal law requires a specially trained Law Enforcement Officer (LEO). I suspect the wilderness rangers you anticipate hiring will not have that level of training. Furthermore, for a LEO to ask if one has paid the fee or has the required permit would have to demonstrate there were "articulable facts that criminal activity is afoot" – (papers please) probable cause.

The Fourth Amendment of the U.S. Constitution provides that "[t]he right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."

The Supreme Court has held that random vehicle stops are unreasonable seizures under the Fourth Amendment. Police officers are required to have probable cause in order to justify stopping a vehicle, or at the very least a reasonable

suspicion that a driver is violating some law or traffic code. The same legal logic applies to one hiking on public lands. The presumption of innocence is an important part of our criminal law system. Basically, it means that if a private citizen is accused of a crime, they do not have to prove they are innocent. Instead, it is the job of the government “ranger” to prove they are guilty. This constitutional protection does not extend to our government – which are presumed guilty until they prove otherwise.

Since the Forest Service started charging fees for a permit to hike/backpacking I have refused in protest to purchase a permit. For one to legally challenge these fees one would first have to be cited to have “standing”. Maybe that is why I am not aware of any one being cited for failing to pay your fees. Forest Service motto: Take nothing but pictures - leave nothing but your money and your rights.

Jack Ward Thomas, Chief of the Forest Service from 1993 to 1996 told his subordinates “Tell the truth and obey the law”. The Forest Service bio for the current chief, Randy Moore:

As Chief, he contributes to our nation’s most pressing challenges: tackling climate change, advancing racial equity and helping the people we serve recover and heal from the global pandemic, in part through connection with our treasured public lands.

<https://www.fs.usda.gov/about-agency/newsroom/leadership-biographies>

Charging a fee for something that is now “free” will impact low-income people the most. Statistically speaking Native American, Black and Hispanics have lower income/wealth than other racial/ethnic groups. Currently and historically these protected groups have underutilized our National Forest lands, your proposal will exacerbate this inequity. A proper and required civil rights impact analysis (CRIA) will demonstrate that the fee proposal will adversely and disproportionately impact members of these protected groups. Thus, your proposal is discriminatory and racist.

Randy Moore and his predecessor’s ideology is trying to solve imagined problems, thus by most measurable metrics everything the agency does has gotten worse, a failure. From the increase in wildland fires due to forest mismanagement to the Mexican drug cartels’ huge and destructive marijuana grow sites. Closing “all” access to national forest lands because of the pandemic caused significant harm with zero real or perceived good. The Forest Service is at this juncture because of a lack of critical thinking skills, not a lack of money.

Conclusion: There is no legal basis for your proposed fees, and your market research-based argument is contrary to the mission of your agency and based on faulty goals.

The fee proposal will adversely and disproportionately impact members of protected groups contrary to your mission statement.

I appreciate your time in considering my comments. I want my comments to be entered into the record for this proposal.

69. They paved paradise and put up a parking lot
With a pink hotel, a boutique and a swinging hot spot.

Don’t it always seem to go

That you don’t know what you got till it’s gone.

They paved Paradise and put up a parking lot

They took all the trees, put them in a tree museum.

Now they charge the people a dollar and half just to see em.

Don’t it always seem to go, you don’t know what you got till it’s gone.

They paved paradise

Put up a parking lot.

70. Raising fees only blocks poor people from enjoying our forests. Poor people have a right to go camping too. Poor people aren’t the cause of severe damage to the forest. People who spend hundreds and thousands of dollars on ammunition just to blow up exploding targets and shoot down trees are the real cause of destruction. Yet these people pay absolutely zero and poor people are left holding the bill.

71. I agree with most of the changes. I think picnic areas should remain fee free. I couldn't get the map to work so I could see where these 2 areas were, but assuming there is no associated water activity area or other recreational use, it would be nice to have a free area to go to.

72. While I applaud improved stewardship of our forest resources, I’m afraid I must state that I am opposed to any proposed day use or campground fees. It is already a financial barrier for several of my friends and family to regularly

acquire snow park and nw forest passes. Adding addition barriers to entry is counter to my belief in the mission of national forests.

I have been skiing, hiking, camping remote and in established campgrounds in the MHNH for 30 years. I have shared the mountain with friends and my children, with folks new to Oregon, and with people from overseas who have never seen wilderness on this scale.

The forest resources should be available to all, not just the well employed. I completely support (free) permits to limit access to overused areas. I completely support regional and federal tax increases to pay for MHNH needs. I support increased fines and penalties for those found violating the rules of the MHNH. But I can't support fees or fees increases on a personal, per use basis.

73. I am in agreement with raising the fees.

74. Have you ever talked to anyone else ever? Have any of them told you that what we really need are more permits and more fees? This proposal must be the brainchild of Satan and Hitler.

I care most about the climbing permit for Mt Hood so I'll focus on it. Whoever had the audacity to speak such an idiotic idea out loud should have been fired on the spot. While I generally support a safe space for the proposal of new ideas, this one is so offensive that it should have been immediately slapped down. Any manager who, upon hearing this, thought it was a good enough idea to perpetuate it, should have their first-born forcibly removed from their custody. Mt. Hood is one of few remaining, fee-free refuges for PNW mountaineers. Not only will adding fees do nothing to make it safer, but it strengthens the case that the mountains are only for the rich who can afford them. I hope you see that you are making a mistake.

75. I say no to fees and quotas. I live in Oregon and this area belongs to everybody.

76. Please don't raise fees. It keeps budget conscious users away.

77. In the MHNH recreation fee increase announcement it states:

Under REA, all new and changing fees must be approved by a citizen's advisory committee. Committee members represent a broad array of recreation interest groups to help ensure that the Forest Service is proposing reasonable and publicly acceptable new fees and fee changes.

When will this citizen advisory committee become active and how will individuals be appointed to this committee? Clackamas Stewardship Partners would like to assist the Forest Service in conducting recruitment outreach for this committee.

78. I may be wrong, but I thought I read somewhere that they will potentially be using the RAC as the Citizens Advisory Committee for this recreation fee increase. I had considered applying for the RAC, but I don't really fit into any of the three categories of representation.

79. I work at Clear Lake Lookout on the Mt Hood NF during the summer. Every spring I return to the tower, and I have to clean up after the renters on my own time. I see firsthand the damage that the renters do. Last winter they broke out the window to the woodshed - what used to be a double plexiglass window is now covered with plywood. A few years ago, a renter cleaned out the wood stove and left the hot bucket of ashes on the floor. This resulted in a much-needed new floor, however they could have burned down the entire tower. There are several other issues, for example they use duct tape on painted surfaces on the interior of the tower. They steal Smokey bear posters and recently took the National Historic Lookout Register sign.

This is why asking for your help. PLEASE create a fund from the rental fees that goes DIRECTLY back to the tower for annual maintenance. Currently the fees go into a general recreation fund. And the tower is not receiving any annual maintenance. In fact, I've been trying to get the windows fixed for several years to no avail.

I'm sure my request will not be well received by the recreation folks. But Clear Lake Lookout is a historic structure built in 1962 and I feel it deserves to be maintained properly. It would be beneficial to the tower if a specific percentage of the fees went directly back to the tower to ensure it will be standing decades from now.

Thank you

80. Instead of a climbing fee how about making climbers ALL carry locator beacons, that would cut down on cost of rescues. I am against raising prices at this time.

81. My thoughts on this fee proposal are no different than they were in my responses to the 1998 Mt. Hood Wilderness Protection Plan Environmental Assessment & all the recent fee proposals and their eventual implementation

on the Deschutes & Willamette NF's, despite the public's valid concerns. Rather than rehash old arguments again, I will simply say that despite the fact that congress has underfunded the USFS since its inception, the concept of forcing people to pay to enjoy their publicly owned forests, while continuing to heavily subsidize extractive forest & grassland industries, is categorically WRONG! This action will simply be the beginning of a tidal wave of pay-to-play fees for people who wish to recreate on the Mt. Hood National Forest.

I strongly suggest the FS legislative affairs staff work a whole lot harder with NGO's, partner foundations & assorted recreational, fishing & hunting associations, e.g., The National Forest Foundation, The Outdoor Industry Foundation, The Great Outdoors Foundation & National Recreation Foundation to exert a concerted & very noisy campaign of lobbying pressure on this nation's do-nothing congress to adequately fund & staff the USFS & end the ridiculous idea of charging the public to use their own National Forests & Wilderness Areas.

82. We do not support a climbing fee. I am unable to attend the meeting tonight but want my opinion heard. Thankfully you guys aren't trying a quota. That will just never work on a mountain as climbed as Hood. There will be a bigger uprising than this. Speaking of being so climbed, if over 15,000 people each year climb Hood, at \$20/pop, you're talking \$300,000! And that's just based on summit numbers. Add others and this balloons more! While I appreciate the need to pay groups like PMR, this is excessive! Clearly, this is a cash grab! I also don't support patrols on the routes. They are there to give rickets. Screw them. Their help to the public will be minimal and we will instead be stopped by invasive bastards we don't want to talk to. Cut out the patrol idea and save a bunch of wasted money right there. PMR and others have always been maintained through donations and that should continue. If there must be a fee, \$20 is way too much and blatant for you clowns to make a profit on the mountain. \$5 at most (and even this is BS). I refuse to pay excessive amounts to climb in or public lands while these private ski resorts are already making a killing. They should contribute. But our public lands should remain free.

83. I'm against the current fee permit proposal unless you change the requirements to above 10600ft at the hogsback level. This would allow you to capture the peak baggers for fees and not impact Backcountry snow riders.

84. The value in outdoor recreation is specifically the fact that it is free. Adding a financial barrier to entry burdens only the poor who look to public lands and free recreation such as the opportunities provided by Mt Hood as a reprieve from the nickel and diming of every other pass time in America.

I myself pay nearly 10% of my income to the state of Oregon. Ask the state for a larger budget, stop asking the taxpayers to simply give more.

The improvements listed on the proposal are absolutely meaningless in comparison to the absolute freedom of access that is utterly lost by adding ANY fee to these sites. Not only are the improvements lacking (zero mention of bathroom upgrades, the only amenity people actually care about), but the costs associated with enforcing these fees diminishes the return even further. We all know the state is also going to fine the ever-living piss out of anyone who violates these fee payments too.

We already paid for these lands. We already pay our taxes. Leave us to recreate in peace.

85. I am horribly upset that I missed the meeting two nights ago with regards to this topic. If you might be able to share the link of the recording with me, I'd greatly appreciate it.

I've got several thoughts on this permit, but I'd like to share one of the most important - if you institute this system, inexperienced climbers will attempt to push onward on days they absolutely should not be going. I've witnessed groups, led by guides on Hood, pushing in weather they shouldn't be going in, and the guides of course know, but their paying clients want to continue. I have video evidence of these groups posting this exact thing, full on blizzard conditions and a turnaround at the Silcox hut. Luckily those groups were with guides and turned around, but what about the stubborn people who would push on because they had to hit their permit day?

I'd love to voice a few more of my opinions and hope that this one is taken seriously. Please let me know who would be best to speak to and I'll draft up a letter.

86. Please do not implement a permit system for Mt. Hood. The climb is so short that getting a permit is an onerous process compared to the time spent on the mountain. We climb up to the summit. Sometimes we even ski down multiple times in a year. Having to get a paid permit every time is an overwhelming and expensive process.

The \$100/year permit is unbelievably expensive for people who might climb once or twice a year. That's way out of line with mountains like Grand Teton, Mt. Adams, etc. We already have to pay for the WA state Northwest Forest Pass

which is an absurd issue on its own. I understand the forest service needs money to operate but needing to have a tax stamp (which is what this is) and then, on top of that, pay a crazy-expensive fee to climb a mountain that takes many climbers 7-9 hours round-trip, is way over the top.

Also, these expenses will exclude climbers who cannot afford the fee. This discriminates against those disadvantaged people who want to experience the outdoors. They must pay an additional tax (fee) on top of the already expensive requirements of being at the mountain. This fee is not inclusive at all and discriminatory against people of smaller means.

Please do not implement a climbing fee for Mt. Hood.

87. I have compiled my comments in the attached PDF.

Please let me know if this an acceptable format (PDF below)

88. I am completely behind rate hikes based on budgetary needs for OUR parks and other public spaces. But you Must Not base ANY fees on 'similar market rates in Oregon;' this is just bare Capitalism, and NOT Public Service. It is inappropriate, as well as short-sighted. Budgetary Need, documented and verified, is required to maintain 'not-for-profit' focus, behavior, and decisions.

Furthermore, 'market rates' makes visits from locals or folks with lower incomes far less feasible (as you Should well know), which is anathema for whom, and for what purpose, those spaces were created. The People. ALL of them.

89. No permit should Ever be required to walk a public space. Period.

90. We the public reject this proposal. I am incredibly offended at any price to use land that is public and already mine.

If you support this, then Feel free to smash yourself in the face with a rock or make a career change to something not involving public lands.

Respectfully

I will not comply even if you do since we the people already own it.

91. I do not agree with any new fees, permits, lotteries, or other restrictions to National Forest Land. Enforce the current policies and use the Mt Hood climbing data that is already available to you. Increasing climber education should not be something that requires \$20 per person to do. Charging a \$20 fee to climb will not magically make climbers use better judgement, nor will it make them more responsible. There are other ways to manage the land besides charging entry fees and limiting visitors. Please consider alternate ideas rather than taking the easy way out. No Recreation.gov above all else. That site is where dreams go to die.

92. I would like to see an annual fee offered for use of Trillium Lake. Perhaps an increase of day use fees would lower the recreational pressure on the lake.

93. Dear Forest Service, while I completely agree with what you are attempting to do with regards to adding fees to pay for improvements, I don't agree with it. Enjoying OUR forests seems to be one of the last free things we can do in our society. It's tiresome to have to pull out my wallet every time I want to do something with my kids.

I pay so much in taxes, and it doesn't seem to go towards what it should. Billions of dollars of OUR money are pouring into foreign countries and yet the US government can't afford some picnic tables and trail maintenance? That's messed up. Prioritize your current budget and use it for what it's meant for...serving the people.

Don't make me pay for something that should be free as a citizen of our country.

Thanks for the opportunity to share with you. God bless.

94. As an avid outdoor adventurer, I am often frustrated by the red-tape, and difficulty in acquiring permits, day-use passes, and camping passes. I understand the need to fund conservation efforts, however, fees (even ones that start low) cause these sites to become a thing of privilege and marginalizes low-income groups.

Rather than a fee, a donation request (venmo, cash bins, zelle etc), fundraiser drive, and volunteer conservation days would be better, allowing those that can support the sustainability of the park while allowing those that can't to enjoy the beauty.

I plan to visit Mt Hood in the near future and would happily leave a donation to support conservation of the park's beauty and majesty..

95. I am writing to you to express my support for your proposal to add permit fees for climbers on Mt. Hood and to increase the areas within the forest which require fees. These are two separate issues really, but both serve to increase revenue to provide different, but needed services during this time of austerity.

I'm an avid recreational user of the forest, and have been hiking, skiing, and mountaineering on Mt. Hood for around a decade. The increase in the number of people using these areas is really staggering. Particularly the number of people attempting the South Side climb on Mt. Hood. The rise of the internet has lowered the barrier of entry for many people. Where in the past, someone may have sought out training with a mountaineering club (as I began) or guide service, now someone may simply rent gear from an outdoor store and find themselves on the mountain later in the same day. I've personally witnessed individuals climbing in the Pearly Gates wearing jeans, tennis shoes and fashion boots, totally unprepared for the experience of climbing Mt. Hood. Funds to provide for patrol, to educate unprepared climbers, for more public information, and assist in search and rescue will be vital to maintaining public access to these areas as use increases. I strongly encourage you to create a robust permitting process which creates funds for these purposes.

As for increasing fee areas within other areas of the forest, I would also like to offer my strong support for your proposal. As use has increased within the National Forest, as have break-ins and theft at trailheads. Every regular hiker in the area will have or know someone who has had their car broken into at a trailhead. More funding to patrol these trailheads and known hotspots will increase the safety and enjoyment of everyone using the forest.

Thank you for considering my comments.

96. In addition to the letter, I sent a couple weeks ago, I'd like to follow up on the point of equitable access to public lands.

Here is an article summary from the White House discussing this topic: <https://www.whitehouse.gov/briefing-room/statements-releases/2022/07/21/fact-sheet-biden-harris-administration-launches-effort-to-create-more-affordable-and-equitable-outdoor-recreation-opportunities/>

If the USFS is not going to be cooperating with the mission of the current White House administration and moves forward with the permit system on Mt. Hood, I will personally file legal challenges to the motion. In addition, I'll be reaching out to Senator Wyden, Congressman Blumenauer, and sending a letter to the White House created Federal Interagency Council on Outdoor Recreation. In addition, I'll be including The Oregonian and OPB in my correspondences.

Thank you for your consideration,

97. Hi, I am a climber located in Portland, OR.

Regarding the fee proposals:

Climbing fee: I am generally supportive of implementing an annual/daily climbing fee and using the proceeds to fund things like safety, SAR, and reducing environmental impact. However, I believe \$100/year is a bit much. Mount Rainier has a similar fee and it's only \$50.

America the beautiful / NW Forest pass: the FAQ specifies that NW forest pass will still be honored for sites with new day use fees. I believe it's important that the America the Beautiful pass be honored as well, as this is honored at nearly all national parks and forests, whereas the NW forest pass is honored only for national forests in the NW.

As someone in Portland, which is near the border of Washington, I have many passes to buy including OR State Park, WA state park (discover), WA and OR sno-park, and the America the Beautiful pass. Having to also buy the NW forest pass would be duplicative for every other national forest area in the NW with the exception of Mount Hood.

Climbing permits: I am supportive of this to the extent it does not limit the number of permits available. I understand this proposal does not limit the available permits, but I am concerned about this in the future. It's important to have the flexibility to climb when the weather provides, not when a permit is available. As someone in the Portland area, I typically climb December through April, before the peak climbing season, as weather allows. I usually leave Portland at 2am and begin my climb at 3:30. Having to visit a ranger station to pick up a permit the day before, or not having the opportunity to climb when the weather allows would severely limit my ability to climb hood in safe conditions.

98. Attached is a letter from PCTA regarding the proposed fee increases on the Mt Hood! (letter below)

99. Yes, we are for increased fees & improvements. We have lived near Mt. Hood for about 35 years and love the area, but with so many visitors it has become too populated at times. I am sure all your employees deserve and would love higher fees and the help that gives. Thanks.

100. No reason to INCREASE the inflation on citizens.

There are no usage fees for urban squatters OR those illegally entering OUR country!

101. Attached is my comment on the Forest Service's proposal for Mt. Hood climbing fees and other recreation site fees. Thanks for the opportunity to comment. (letter below)

102. If the permits are going to limit the number of users, please consider splitting the mountain into zones. Southside is most heavy used while the Northside much less as it requires more technical climbing. The technical routes are much more conditions dependent and permit reservations will be made last minute. It would be unfortunate to lose access to the rarely used side of the mountain because these are too many users on the popular.

103. I appreciate the need for changes to the system on Mt Hood with respect to the traffic that it receives. I see the lack of permit limits as a positive in that it doesn't force people to decide whether their money is forfeited or not and push into bad weather conditions. This doesn't solve the material issue of crowding and feels like a money grab. For locals that use this as a training ground, \$100 for a season is a slap to the face and works against inclusivity. It also doesn't seem to solve any problems as the use of the permit fees is stated. I would love to see an effort towards increased access on other parts of Mt Hood to alleviate the crush of people rather than a reach into the pockets of citizens.

104. Hello. I commented on a few specific sites in the map tool but wanted to send a note to emphasize that I am supportive of the recreation fee increases only as long as they will really result in installation of things like picnic tables and fire rings where they are missing, garbage collection, and replacing the terrible old vault toilets that currently exist at so many sites. In addition, these sites need to be cleaned and maintained on a regular basis. I would be unhappy if these fees are charged with no noticeable increase/improvement in facilities and site maintenance, and I am sure others would be too. This can't just be a money grab with an empty promise to improve services. As a former recreation manager on the Clackamas Ranger District in the early 1990's, I know that the recreation budget is never adequate and certainly understand the need for more revenue, but you can't increase these fees and promise to improve services without a plan to actually do so. You either will have to require the concessionaire to clean and maintain these sites, or you will have to hire seasonal recreation folks to do this work.

105. As a wilderness first responder and understanding of the many avoidable evacuations on Mt Hood every year - I acknowledge the purpose for putting a mandatory climbing permit in place.

However, I don't see the need to restrict climbing below 10500'. I strongly believe many injuries and rescues can be avoided by restricting access to the summit ONLY. I suggest moving the permit height to 10,500'- or at the bergschrund elevation / hogsback. This restricts the primary area for danger.

Please help keep our mountain safe - but also accessible.

106. I am writing to say I do not agree with the proposed Mt Hood climbing fee. Even if a permit is implemented, I believe it should only be the main "climbing" months (April, May) when most rescues occur. I also feel that the fee is too high, both yearly and per climb, especially at a time when inflation is high, and people are struggling financially.

107. I am writing this email on behalf of myself and my climbing friends who enjoy skiing and climbing on Mt. Hood all year round.

We do not support fees at Mt. Hood. Mt. Hood is a special place for all people to recreate. Please don't change this, thank you.

108. I strongly oppose the "Summit Pass" portion of the proposed fee structure.

109. I'm commenting primarily on three things:

I'm all up for controlling the number of climbers at the top of Mt Hood but the \$100 per year fee for climbing above 9500' is too high. It's out of line with other annual pass fees (snow park, forest pass, etc.) and I believe you can accomplish your same funding goals while not punishing the locals who frequently climb and ski up above 9500'. I would guess that well over 95% of your revenue will come from the \$20 fee per 2-day climbers and the funds received from those of us (experienced climbers) that regularly climb into the upper part of the mountain is immaterial. But it's a lot of money for the individual climbers. I would suggest a \$40 or \$50 per year fee would be reasonable, if the 2-day pass is \$20.

Also, it is critical that the NW Forest Pass serve as a day-use pass to these new fee areas (separate from the Mt Hood climbing permit). That annual pass should provide access to all trails and day-use areas.

Many of us have been buying NW Forest Passes since the program started and we've seen very little in the way of improvements or trail work – what's to say that these new fees are really going to result in visible and functional improvements? There are tremendous pressures on these forest service sites right now and there needs to be some improvements and even expansion of the existing trail systems and camping sites.

110. With regard to fee changes within the Mt. Hood National Forest:

-I disagree with this proposal for the climbing permit. I do not see any evidence that the proposed permits will have a significant positive impact on climbers or the public, and I fear future changes to a reservation/quota system similar to what has been implemented on other area peaks. Additional climbing rangers will only add value if the rangers are highly qualified and competent climbers, and the current plan does not appear to have any requirements for that. Additional social media information about climbing conditions is not valuable, there is already a lot of this information available, much of it from better qualified sources such as PMR. The only "improvement" related to this climbing fee that appears to add any value is a toilet facility at Timberline, but a special climbing fee should not be necessary for this. Many day-use areas in the MHNH have pit toilets (Mirror Lake, Little John, White River, etc.), and those are all funded with the NW Forest Pass. Simply require that Timberline visitors also have a NW Forest Pass and use those funds for a toilet.

Additionally, the proposed fee structure is outrageous for the proposed level of services. Mt. Rainier charges an annual fee of \$53, and this includes multiple toilet facilities high on the mountain, helicopter waste removal, and a permanent staff of rangers at multiple high camps. To provide a much smaller range of services at twice the price is shameful.

-Changing some high traffic areas from their current free status to requiring a NW Forest Pass seems sensible. For example, Ramona Falls or Timberline. It is imperative that a NW Forest Pass be accepted as a form of payment in these areas.

111. I support these fees.

112. I'd like to voice my opposition to the proposed Mt Hood Climbing Fee. The purported argument for this fee is safety concerns on the mountain, and this fee would be used to hire a ranger to improve climber education. However, it seems there are much cheaper alternatives to enhanced climber education; for example, adding signage at the climber's trailhead and at the top of the Palmer lift relaying the risks of climbing Hood without the proper equipment. Why not try something this simple and see if it works before jumping to the much more expensive option?

Another purported argument is it is hard to track how many people climb the mountain due to not everyone filling out a permit. This is almost certainly due to the permit area being far from the trailhead. Every other trailhead on Hood has a permit station right on the trail, making it very easy for hikers to fill out a permit. Why not do the same thing for climbing Hood?

Both of these options seem way cheaper to everyone involved to execute and would not create further barriers for people to enjoy the mountains.

113. I think is a reasonable plan.

My concern was backcountry skiing.

My most common area to go is Illumination Saddle.

Based a map check it is still accessible under the proposed rules.

114. Frequent Mt Hood area recreator and I am in strong opposition to the proposed new fees. Specifically, I take issue with the climbing fees on Mt Hood, the proposed prices appear to be a pure cash grab, I mean a \$20/\$100 fee to access our public lands with no infrastructure?? Also, not a big fan of charging a fee at currently free camping locations unless that is coming with infrastructure improvements.

What I don't necessarily oppose is adding day use fees to sites that are currently free, if infrastructure maintenance is needed at those sites. I have no problem buying a NW forest pass.

I understand costs of maintenance are rising, just like everything else but so are wages and taxes. The extra funds should come from the taxes I am already paying.

115. I recently learned that there is a proposed Mt Hood summit fee. I have a couple of comments:

1) Why is the fee for summiting rather than for general trailhead access?

In the case of winter climbs, we already pay a sno-park fee to access the trailhead. Is this money being used to support summit-specific expenditures (like rescues)?

2) Why is the cut-off elevation 9500ft?

9500ft is below the common turn-around point for most people climbing but choosing not to summit. On the south side, 9500ft is about the bottom of Crater Rock, but most people choose the Hogsback as a turnaround point. My understanding (I don't have the data) is that most accidents occur above the Hogsback (10,500 ft) where the terrain becomes much more technical and dangerous.

116. My name is xxxxxx. I am a resident of Portland and a member of the Mazamas mountaineering club. I have been skiing, mountaineering and climbing on Mt. Hood and throughout the Cascades for nearly 20 years.

I do not disagree with the idea of a permit system and requiring a fee for use of areas with heavy usage. However, I disagree with the idea that the fee and permit should be for only those who plan to summit Mt. Hood. Why are only these participants required to pay? This is a group that arguably has the least impact on trails and crowds since the fraction of those hikers and those recreating on Mt. Hood who actually climb above 9500 feet is very small. Most hike and climb well below this level. Why not require a fee for all who are recreating in the area?

I'm also wondering about enforcement. Will this be a system to charge only the very few of us who will honestly pay the permit fee if there is little enforcement?

I believe if it is necessary to collect permits and fees from those on Mt. Hood, it should be all who use the area, not just those climbing above 9500 ft.

Please consider these ideas when implementing a permit system for Mt. Hood.

117. I'd like to make two more points my original comment didn't emphasize enough. First, fee systems using recreation.gov discriminate against people without credit or debit cards, those who have poor credit, and those without bank accounts. There are still people who pay with cash or checks, and our fee systems need to accommodate them. We have a two-tier system where tech-savvy people of means have easy access to our lands, but those living on limited money are left out when trying to visit fee sites that require credit or debit cards and computer skills. They are pushed into the shadows, being unable to even see the solicitations for comment from the agency since so much has moved online. Those people have just as much right to our lands yet can't voice their concerns. There needs to be outreach to these groups so they can participate in the decision-making process.

Second, the Forest Service should increase the allocation of fee dollars toward construction of accessible sites for handicapped people. Those with wheelchairs, walkers, and limited vision still need to get outdoors and enjoy the woods just as much as able-bodied people.

118. Please do not require a fee to climb Mt Hood. This will only make it harder for people of lower income to enjoy these types of activities and discourage diversity. It will also make climbing more dangerous, as people who have paid for a permit will be less likely to turn around if weather or health conditions deteriorate. Making hiking and climbing less diverse, more elitist, and more dangerous is unwise on every level.

119. I am in favor of the new fee system

120. Good morning. I am contacting you regarding the recently published Mt. Hood climbing permit fee structure.

I am in full support of these proposed fees. I am an active climber in the Pacific Northwest community with first-hand knowledge of the current crowding on Wy'East / Mt. Hood. This causes a tremendous impact on the resource and a dangerous situation for climbers. I also have deep empathy for the work and burden based on mountain rescue personnel when things go sideways.

I am hopeful that the implementation of climbing fees and permits will ease these situations and provide better support overall. You have my full support. Thank you!

121. I would like to submit these comments into the record.

It is my understanding that the permit fee you are proposing is significantly more than comparable of more technical climbs in the PNW. 20 per climb or \$100 per year whereas Mt Rainer is \$50 for the year. It is unclear what you will be spending the income on. I believe rescue is currently handled by volunteer organizations. Will that be changing? Will these fees be funding climbing rangers which will be available on the site at the times that climbing occurs? Are there specific plans for these funds and if so, what is that?

I am not against charging fees for climbing as long as those fees are appropriate and being spent in a logical manner. I have looked over the site and do not see that any specific plans have been made. I believe that the fees should reflect actual costs and plans, but that doesn't appear to have been completed. Please hold off on this plan until those cost have actually been identified and quantified.

122. I'm writing to oppose the proposal that would require a fee to obtain a permit for climbing Mt Hood. Mountain Sports is already incredibly expensive to participate in and fees like the ones proposed will serve as a barrier to participation.

123. I am in favor of the proposal to institute a climbing fee in Mt Hood National Forest.

Environmental impact has only increased in years as the number of climbers have increased. A proposed fee could help offset labor to recover the impacted high alpine.

I do hope that the fees could help fund a seasonal climbing ranger too, but I understand that's a long process.

124. I'm writing to voice significant opposition to the proposed fees for climbing Mt. Hood. The season and day climb fee schedule is set to impair the ability of locals who regularly utilize the mountain for recreation while acting as minimal deterrent to climbers from outside the area who present the greatest burden on the area and rescue resources.

Local, regular climbers frequently climb to ski above the palmer lift all summers. These individuals take the time to educate themselves on leave no trace techniques and prioritize sustainable recreation as this is their backyard. We are not pushing limits to the summit in inclement weather or extending ourselves beyond our abilities. You're taking away a natural refuge for us as well as the closest training resource for many of us to work toward larger alpine missions.

The \$20 fee is extremely costly when added up across weekly ski visits.

This fee schedule is also insufficient to deter the individuals who pose the greatest risk to the Mt. Hood environment, rescue resources, and facilities. \$20 is not a big deal to drop on a weekend trip while in Portland visiting from another state. I think that it would make a lot more sense to have "in state" and "out of state" fees for climbing, just like fishing licenses in Oregon - ask more investment from the people who have less of their lives already invested in this natural area. I also would love to see more educational resources readily available and meaningfully presented to climbers.

Lack of education is part of why incidents happen on Mt. Hood, and it's far too easy to go up without any education.

I deeply hope you'll reconsider this fee schedule and other strategies to improve traffic climbing Mt. Hood.

125. Attached, please find TKO's comments on the proposed new trailhead fees. (letter below)

126. My name is Jack Dwyer. I have lived in Portland for the last 8 years. I typically snowboard 60 to 100 days a year.

Mostly on Mt Hood and in the backcountry. I currently run the Mazamas Backcountry Ski-Touring class. For the last 30 years, this 2-month class teaches students an Avy 1 equivalent education and additionally gives them skills in uphill travel, route planning, navigation and more. This is a volunteer position and is basically a part time job for half the year. I am passionate about the backcountry on Mt Hood and supporting backcountry users.

I'm writing to comment about the proposed climbers fees. As I'm sure you know, 9500' on the south side of Mt Hood can be reached without even entering avalanche terrain. Going up to Crater Rock, Devil's Kitchen or to the Hogsback is what I use for training. I've been above 9500' on Hood more than 100 times and probably go 20ish times a season. And only summit less than 5 times a year, when the ski down is good. Point being, going above 9500' isn't a commitment to summiting or climbing Mt Hood. If this has to happen, I think going above the Hogsback is a better point for applying a climbing fee.

But taking a step back, I don't support the proposed climber fee. Mountaineering is an inherently dangerous endeavor.

Backcountry users need to take responsibility for themselves. I don't think it's the Forest Service's responsibility to be informing, educating and patrolling the situations of backcountry users. Which seems what these funds are primarily intended for.

127. Attached to this email is the official and formal PMR comment to the Mt. Hood National Forest Climbing Permit proposal. (letter below)

128. I am submitting a comment regarding the proposed fees for Mt. Hood national forest. In general, the proposed increases from \$0 to \$5 seem reasonable if the fees translate into better care and stewardship of these spaces. However, the proposed "Mt. Hood Summit Pass (above 9,500 ft.)" is quite expensive and the two options (\$20 for two days or \$100 per year) aren't great options. Why not a per day rate? Mountaineering is already an activity with a lot of barriers for many people and to add such a high-cost permit will continue to prevent those people from being able to access alpine sports (which is dominated by white, wealthy, and male demographics). I do think that if the National Forest is going to increase fees, there should be another outlet that provides reduced cost/fee waivers for folks who would otherwise be unable to recreate on this land. The difference between free and \$5 may be of little issue to some, but may present a substantial barrier to others. I hope that the national forest prioritizes equity in its decision making.

129. I wanted to comment on the new proposed fees in particular to the climbing fee for summiting Mnt Hood. The added fees seem to be excessive, without much added benefits to the current users and seem to be a deterrent.

We are already paying a parking fee for the snow-park and adding a climbing permit without any added benefits seems excessive. For example, I don't think added patrols along the route would help people make good decisions. Climbing a mountain specially Mnt Hood always has inherent risks and climbers are (mostly) well aware and prepared for it. Like many other local, I try to climb Mnt hood once a year. It typically takes me 3 attempts each year to climb it, given the variable conditions specially at high elevation, we often turn around well before 9500 ft. With the proposed fees, I would have to purchase multiple permits per year and will probably only use 1 out of the 3 that I have purchased. The fee seems like an extra deterrent for climbers without any good method of enforcement with little added benefits to its users.

Adding day use permits, especially for heavily traffic areas (Lolla's pass and) is fair if there are real issues that need to be addressed there (ie, trail maintenance ,) along the PCT/Timberline Trail, snow plowing, Most of the regulars will already purchase the annual pass, so I'm not sure how much revenue it will even generate.

As for campsites, adding new paid sites with cabins and Yurks are great ideas. and it will increase access to the public. Improving already paid campsites that are heavily visited is also a great idea, as it improves quality specially in those areas. Despite that, having low maintenance campsite without a fee has always been one of the features of Mnt Hood camping that attracts many locals. In these sites, I have never seen an issue with fire ring, lack of tables, or security. The lack of facilities is in fact features for many people that create a more remote environment.

Please feel free to contact me if you have additional questions.

130. I have been climbing hood for over a decade multiple times every year and think it's important for experienced mountain climbers to have access to their local mountain to maintain our fitness and skills. We are typically the ones that provide assistance (besides rescue services) to new climbers and provide support when needed. The fee is completely outrageous compared to other PNW mountains and will just keep experienced climbers from climbing hood because we cannot afford the annual fee. This fee will not stop inexperienced climbers from climbing the mountain. It will limit people that have money to climb the mountain. Inclusivity and diversity is so important to provide access to underrepresented groups, but this fee will provide another barrier to this group. Please hold on this change and try to brainstorm other ideas that will actually help keep climbers be safe on the mountain. A huge fee is not the answer!

131. I tried using the USFS map to provide comment on my phone but was unable to get to the map to provide a comment. The user interface is really odd and counter intuitive.

132. This is my public comment for the Mt Hood National Forest proposed fee increase

First i am in favor of adding day use fees and increasing fees at some trailheads and campgrounds. I recognize that much of the national forest infrastructure is deteriorating and i am in favor of raising funds to help improve this. Additionally myself and most forest users buy an annual NW forest pass so many of us will not be directly affected by these rates.

I am opposed to mt Hood climbing proposal. The rate, \$20 daily and \$100 annual are arbitrary numbers. The forest has no and maintains no climbing infrastructure. Timberline Lodge maintains the lodge and ODOT maintains the roads and parking lot. None of this fee will aid S&R crews. The fee will hire a full-time climbing ranger and seasonal rangers during the peak climbing season. These rangers will be able to send people down the mountain for lack of permitting but will have no authority to send people down due to incompetence, poor conditions, unsafe gear, etc.... This permit will not make climbing Mt Hood safer, only more costly. This seems like an unnecessary fee to create a salaried position only to enforce the fee. Further, enforcement will be very difficult and will likely result in enforcement only occurring on the south side climbing routes. I don't think this permit is well thought out or will bring any benefit to the community. I hope that you rethink this and come back with a better proposal.

133. I have these points to make about the proposed Mt Hood summit pass paid permit:

- The yearly pass is excessive. Mt Rainier charges \$50 for a year, with Shasta, Adams, and others coming in much lower. This will only increase inequity in access to the outdoors. This excessive fee will only increase racism and discrimination in the outdoors.
- The forest service provides no rescue service on Mt Hood. Any attempt to persuade the public that you do is criminally deceptive. You know that the sheriff departments and non-profit groups like Portland Mtn Rescue, and the Crag Rats do all the rescue work on Mt Hood and would receive none of this money. Any money being collected should go to

those organizations and their opinions on permitting should be weighed heavily in this decision.

- Rangers will not be up there from midnight to 5 am to provide education when people most need it. They will only be there to catch people who do not have permits on their way down. This is a self-serving fee. Collect money to pay a ranger to make sure people have paid money. This makes the National Forest service look very bad.
- Mt Hood will be more dangerous with this fee system by increasing the urge for people to go for the summit when conditions aren't ideal because they've paid for it.

I'm an outdoor educator and I recognize this proposal as only causing harm, as it is a money grab by an organization that does nothing to ensure safety for Mt Hood climbers.

134. I am firmly opposed to the proposal for a climbing fee for Mount Hood. The proposed fee is far more expensive than the other volcanoes in the area. This is especially burdensome in an already uncertain and difficult economic climate. Furthermore, the revenue generated by the permits is not even funding those who actually perform the mountain rescues (Portland Mountain Rescue). I cannot be more opposed to this proposal, which is nothing more than a money-grab.

135. Attached is my comment on the Mt Hood Climbing Fee Proposal (letter below)

136. Dear Mt. Hood, National Forest Recreation Fee Planning Team,
Please find attached public comments related to the proposed Mt. Hood Climber Permit.
We look forward to working with the Forest on this project. (letter below)

137. To be brief as I bet, you're getting tons of feedback:

If implemented, a Hood climbing permit must be date flexible as weather is such a planning variable, and incentive could be to push into unsafe weather if permit is not date flexible.

Permit should require carrying safety gear indicative of a trained mountaineer, maybe with potential penalty if caught without

Permit should require a signed statement of having a list of required mountaineering skills, such as crampon use, self-arrest in all orientations, roped travel if conditions require, map of route with hazards, avalanche training in winter months, NAVIGATION, etc to try to warn off the novice we hear about in rescue stories

138. Please find attached public comments related to the proposed Mt. Hood Climbing Permit and Fee Proposal. We look forward to working with you as this program develops. (letter below)

139. I'm writing to express my opposition to the proposed new climbing permit and fee proposal for Mt. Hood. The mountain is already well-served by multiple search and rescue organizations, and I'm skeptical that Forest Service personnel have the necessary experience and training to significantly contribute to these services. Additionally, the vast majority of climbers already access the mountain from well-established parking areas (notably Timberline Lodge and Mt. Hood Meadows, for those climbing from the east and even Cooper Spur in the spring) that don't need additional Forest Service funds.

Finally, my experience with acquiring required climbing permits on other mountains like Mt. Shasta, Mt. St. Helens, and even Mt. Adams in the past have been overwhelmingly negative, and I simply don't believe that there won't be a subsequent attempt to add climbing permit quotas and reservations if this proposal is approved.

Thanks for your consideration.

140. National Forest Folks, I strongly object to charging fees at trailheads for a day hike in Mt Hood National Forest. These lands have been open to us for generations, and we must keep them free for all people to come out and enjoy a beautiful day in the forest. Fees make it difficult, if not impossible for many people to use the trailheads, and these people are often from communities of color. We want all people to have free access to our public lands. Take a stand! Keep our public lands open and free to all for now and future generations. This is part and parcel of who we are as Americans and our great traditions.

No trailhead fees!

Thank you,

141. I am fully against the new proposed fees especially for the summiting and climbing of Mt Hood. Climbing and backcountry experiences are already a wealthier white person sport, and we are further marginalizing communities with less money and often of color. If everything in the outdoors costs money, there are no free parks that people can get out and explore. I get that maintenance and forest rangers cost money, but another fee is not the way. The federal and

state governments need to place a higher priority on protecting wild spaces that do not disenfranchise and exclude new people from entering the outdoors. Guide services will now have another hurdle to clear to get people up the mountain and into the teaching opportunities. I worry permit windows will further push people into the mountain that I have to summit today mentally over the mountain is always there, except when I don't have a permit. We already have caps on ski resorts and have to plan weeks in advance. The solution is to find another source of funding and provide better education. By introducing fees, I feel we are copping out of doing the hard work and decreasing safety on an already busy mountain. The same groups that can afford the \$100 annual pass will still buy and push to climb any but the groups learning and moving into the sport will be pushed out. I treasure the ability when the conditions are right to ski tour up to Devils Kitchen and turn around when the conditions are not right or the slope is too crowded; having the flexibility for all keeps us all safer.

As a member of Oregon Backcountry Alliance under Winter Wildlands this proposal is against what I stand for. Here for additional questions via phone or email.

142. In April 2022 the Mazamas learned of the new proposal by the Mount Hood National Forest to implement a fee-based climbing permit system for Mount Hood. We are grateful the Forest Service has included the Mazamas along with other local stakeholder groups from guide companies and Search & Rescue organizations to share the Forest's perspectives, intentions, and to solicit feedback on the proposal.

The Mazamas is in agreement with the Forest in promoting better stewardship throughout Mount Hood National Forest, increasing safety and climbing education, and understands the Forest's need to collect usage data; however, the Mazamas is opposed to the implementation of permit fees, and would prefer funding through other means at the federal level.

User fees create a barrier to under-represented groups that is counter to the mission of the Mazamas to inspire *everyone* to love and protect mountains. Imposing user fees shoulders the burden on individuals for supporting a federal agency that has seen its federal budget and number of personnel steadily reduced over the last 30 years while visitation and outdoor recreation has increased exponentially in the same period —especially in the COVID-19 pandemic. A well-funded Forest Service would benefit local economies beyond the interests of only outdoor recreationists, and the Mazamas would be interested in working with the Forest and other stakeholders to lobby for the restoration of proper funding to accommodate increased visitation and accomplish the goals of increased safety, education, and stewardship.

143. I do not agree with the climbing fee proposed for permits for Mt. Hood. There is already a permit, so this new permit is not necessary. The argument that it will cover rescue costs is invalid, as rescues are done by volunteers - Crag Rats and Portland Mountain Rescue. The rangers are not present when most climbers are on the mountain starting around midnight through the early morning hours.

The fee cost is unprecedented, as an annual permit for Mt. Adams is \$30 and Shasta is \$30 too. Rainier is only \$50 for an annual permit. Even the America the Beautiful pass for all national parks is only \$80 for a year. \$100 is unheard of for an annual climbing permit.

There are no limitations on the permits issued, so this doesn't address the concern of congestion. In addition, the accidents are not caused by congestion, per evidence over the last 20 years. If anything, permits increase the risk for accidents, as people are more likely to go during bad or questionable weather, because it is the day, they have a permit for. By requiring permits for Hood this could lead to more accidents, of which the USFS doesn't respond to, but volunteers do.

This permit gives money to the USFS but doesn't actually give anything back as it claims to, as discussed in my concerns above. As a born and raised Oregonian that values our forests, I do not support this climbing permit fee for Mt. Hood.

144. The current proposal for climbing permits for Mt. Hood above 9500 ft raises numerous concerns: The cost is not consistent with any other mountain in the state or surrounding states. Mt Rainier for example not only has trained, technically certified climbing rangers, it also has many more amenities. The proposed costs do not appear to be aligned with the current amenities and resources present nor what is being proposed.

The annual climbing permit cost will be prohibitive to many people, and the inherent restrictions surrounding a two-day permit will encourage climbers to proceed despite inclement weather and/or hazardous conditions that may have developed in the interim. Many climbers will not (by choice or due to the lack of resources) turn around and purchase a second climbing permit pushing themselves into dangerous conditions.

In your public meeting it was mentioned that the climbing ranger does not need to hold any specific certifications. The rangers on Mt Rainier, again, are required to obtain and maintain pertinent and appropriate certification ensuring they are trained and prepared to appropriately and accurately assess conditions, provide emergency medical care and even function effectively in any or all search and rescue events. If this is the case, what is the real role of a ranger on the mountain, one could assume they are only there to patrol for permits as their benefit to overall safety is not clear in your proposal. How exactly does one untrained ranger, or even one solo yet trained ranger change the safety or accident outcome on all of Mt Hood's upper zone and reduce human impact?

Toilets or blue bags are needed. Climbers arrive early, the lodge and ski resort are not open at those hours nor do they want or tolerate climbers rolling in to use their amenities. The bathroom and blue bags historically present for climbers and skiers have been closed for the past few years making waste management even more challenging. Imposing an annual fee to support a better waste management system is justifiable but a \$100 yearly permit or \$20 every time you climb Mt Hood is excessive and again, not aligned with the proposed intentions behind the fees.

Nothing in the proposal justifies why the proposed cost is so steep and out of alignment with other climbing permits in Oregon and surrounding states, when and where bathrooms and trash collection will be built and open for use and how one individual ranger will shift the safety and accident profile of the mountain. An annual fee of \$10-20 may be more appropriate for the current conditions and proposal, even more so considering this is a trial period and no upgrades or installation of amenities have even been outlined let alone implemented.

I believe there is a way to gain all the desired outcomes in your proposal that can feel more compatible with the actual needs of the mountain and recreators while staying consistent with surrounding and similar climbing zones.

145. Please see my attached comments providing feedback on the proposals for Mt. Hood National Forest. (letter below)

146. I do not think the proposed climbing permit for Mt Hood is a good idea. I'm particularly concerned that the permits season will push more people to climb later or earlier to avoid the fees when the mountain is more dangerous. It may also push people to continue up when they may otherwise turn back, since they have to spend more \$ to be there. I'm concerned that this also decreases the access for low-income people.

Overall, yes, the mountain gets over crowded on busy weekends during peak climbing season, but for me personally I just climb different routes where there is generally never anyone else.

Please don't add more fees for people to recreate on public lands.

147. My name is Marcus Donaldson and I am a longtime local alpinist, having climbed Mt Hood many times over the years as well as having served as a rescue member with Tacoma Mountain Rescue Unit.

I am not in support of the proposal to add a climbing permit and fee requirement to climbing Mt Hood for the following reasons:

- 1) There are already existing waste facilities (including a bathroom) currently at Timberline that previously were open and available to the public as part of their lease agreement. When in operation, this service helped mitigate waste on the mountain and should be restored.
- 2) Climbing rangers should be a trained, certified and skilled position - such as on Rainier and in Denali NP. Having the proposed unskilled personnel high on the mountain unable to initiate rescue operations, provide basic medical services, assess climbing conditions via avalanche forecaster-level qualification - let alone be skilled enough to navigate the most technical parts of the complex terrain on Mt Hood is not only useless, it is possibly dangerous to climbers thinking these resources might be available.
- 3) Forcing climbers to pick hard dates for their climb negates the ability to flex based on constantly changing mountain conditions. More often than not, my own successful ascents of the mountain involve changing dates to best utilize weather windows, high winds, changing freezing levels or avalanche conditions. Losing this ability can compromise even an experienced team and, at worst, place climbers in unnecessary risk.
- 4) The proposed \$100 annual fee far exceeds similar fees on other regional volcanoes, including Mount Rainier, where much more extensive services, support and infrastructure exist on the mountain. It is outrageous to expect every member of the community who wishes to enjoy his or her local alpine summit to pay this outrageous cost.
- 5) Lastly, PMR, Cragrats, AMR Reach & Treat and Clackamas County Sheriff have been meeting operational cost for many years without MHNF support or interference.

To propose that this fee structure as an effective way to fund mountain rescue as a veteran of a volunteer mountain

rescue unit and with many friends and contacts within both PMR and Cragrats I know that is a falsehood. If climbing on Mount Hood may indeed become regulated to some degree in the future, my hope it is not via this poorly constructed and ill-conceived plan.

148. Below are my comments with regards to the proposed Mt. Hood Climbing Fee. Thank you for taking the time to read and consider them.

149. Comments on Proposed Mt Hood Climbing Fee: I am writing as an active member of the Mt Hood climbing community, a rescuer through Portland Mountain Rescue (PMR), and a leader and instructor for the Mazamas mountaineering organization to express my concern that the Mt. Hood Climb Fee proposal is poorly planned, insufficiently researched, discriminatory in nature, and provides no overall benefit in climber safety on the mountain. Moreover, I believe the USFS is actively misrepresenting this proposal and their role on the mountain to take advantage of public ignorance for their own funding purposes. It is clear to me that the hasty rollout of this proposal needs to be terminated immediately and any proposed future changes need to be directly derived from their stated goals for such a program.

Proposal Motivation

Mount Hood National Forest (MHNF) as a part of the United States Forest Service (USFS) suggests that increased crowding on the mountain has led to additional strain on Search and Rescue resources that has had an adverse impact on safety and that this proposed climbing fee will address this. It is with this goal in mind that I look at the USFS's proposal and find a complete failure.

Climber Crowding on Mt Hood

The USFS fails to provide information that climber crowding on the mountain is a problem. A wilderness permit is already required to climb Mt. Hood the USFS should have the data to present how much activity on the mountain has changed in recent years driving this need to limit climbers on the mountain. This information has not be presented to the public in outreach events related to this proposal. Beyond that though there is the question of whether this additional usage of public lands is adversely affecting climber safety leading to a disproportionate increase in rescues on the mountain. To investigate that, I have read every accident report from the last 20 years on Mt. Hood in Accidents in North American Climbing, an annual recap of notable accidents distributed by the American Alpine Club, which includes about 40 of the most notable accident reports during that time. Along with this as a member of Portland Mountain Rescue, I have read all of the 70 available mission reports from Mt. Hood in that time. Not only is there a lack of evidence that multi-climber falls have increased recently due to increased climber congestion, but there is also not a single accident I have found in the last 20 years that involved one climber or party falling and leading to another climber or parties injury. The only relevant accident of note is an accident from 2002 where one team roped to each other but not secured to the mountain in anyway fell into two other rope teams due to the wide net the rope effectively acts as when the climbers are falling out of control. This practice of roping to other team members has been since widely acknowledged as extremely dangerous and has nearly disappeared from the mountain in the last 20 years, representing an increase, not decrease, in safety in recent years.

Effect of a Fee on Climber Participation

If one operates on idea that climber congestion is a problem on the mountain, of which there is no current evidence as illustrated above, the USFS's proposed method for curbing it is deeply problematic. There already exists a free permit to enter the wilderness areas of Mt. Hood, the only thing that changes is the price. Basing any attempt to curb climber activity on the mountain through financial barriers has severe inequitable implications on low-income individuals, a large percentage of whom are from underrepresented groups in outdoor activities. Public lands exist as a resource for all to enjoy, not merely as a playground for the rich. Discriminately prioritizing those with disposable income, in addition to the moral problems, shifts the distribution of climbers on the mountain in concerning ways for climber safety. Without a doubt the most problematic type of climber are the ones who give the mountain little respect, wanting to climb it as a once in a lifetime experience. As a rescuer with PMR I have frequently participated in rescues of individuals who did not put in the time an energy necessary to gain the skills to climb the mountain, but instead had no problem pulling out their wallets to buy their way to the top however necessary. To these people an additional \$20 fee will make little difference.

The climbers that will no doubt be affected are the experienced climbers on the mountain who climb many times a year and will bear the brunt of these fees. Charging 5 times a daily fee for an annual pass is unprecedented and will lead to

a shift towards a greater ratio of inexperienced climbers on the mountain. Experienced climbers not only are less likely to get into accidents themselves but are also more often than not first on scene when an accident occurs. Experienced climbers very frequently have first aid training and rescue skills that can save a life before rescue personnel are able to get there. This past June, as a private climber outside of my functions as a member of Portland Mountain Rescue, I was in the crater when a 700 ft fall down a icy slope and into a toxic fumarole happened. I along with a team of a few other experienced climbers were able to extract the fallen climber from the hazardous environment and stabilize them while we waited hours for more rescue resources and a helicopter to get there. I have no doubt we saved a life that day. This is just one of many situations where experienced climbers on the mountain have saved lives. A \$100 annual fee represents a financial barrier I cannot afford and means others like myself will not be available to assist when inevitably accidents do occur. No number of climbing rangers will be able to offset this loss.

Fee is Unparalleled

The proposed annual fee of \$100 is nothing short of outrageous and demonstrates a complete failure to engage in research of similar fees. It is worth stating that most Cascade Volcanoes have no specific climbing related fee: Mt Jefferson, North Sister, Middle Sister, South Sister, Glacier Peak, Mt Baker, etc. Those that do are nowhere near the proposed fee: Mt Shasta (\$30 annual fee), Mt Adams (\$30 annual fee), and Mt Rainier (\$53 annual fee). In particular, the Mt. Rainier Climbing Fee required of all people who go above high camp (~10k ft) provides for "rangers to respond to search and rescue incidents, staff ranger stations and high camps to register climbers and provide up-to-date route conditions and remove human waste from the mountain and dispose of it properly" per their website. Beyond this in my experience, these rangers go around to every climber in high camp to advise on conditions and plans and offer them suggestions about safe climbing practices. The proposed Mt. Hood fee which is twice this does not cover the helicopter rescues, the around the clock staffing of experienced climbing rangers at high camp, or the human waste removal that the Mt. Rainier National Park Climbing Fee does. It's truly bewildering to think where this money is going. Beyond that, one can draw comparison to other federally managed public land fees like the America the Beautiful Annual Pass which for \$80, less than the proposed annual Mt. Hood fee, gets a person and everyone in their car into every National Park, National Forest, etc. in the country.

Extremely concerning about this fee is how it is being presented. The USFS suggests it is on the low end of similar fees, for example see 19:00 of the Facebook outreach presentation where the USFS states "if anything we think we're proposing a fee that's on the lower end compared to other Cascade Volcanoes." Again, I reiterate that most Cascade Volcanoes charge no climbing specific fee and of those that do the greatest charges about half of this proposed fee. The USFS is either blatantly lying to the public in their outreach about these fees or this represents a complete lack of awareness and research in making this proposal. Both of these are deeply problematic and grounds to stop this process immediately to sort out what is happening.

USFS is not responsible for rescues

Unlike National Parks, as an example, which operate as independent entities and handle their own rescues, rescue in National Forests falls under the jurisdiction of the state and county level resources. Specifically, rescues on Mt. Hood which is on the boarder of Clackamas County, OR and Hood River County, OR falls under the jurisdiction of the Clackamas County Sheriff and the Hood River County Sheriff depending on the location of the accident. Under these Sheriff's direction, the specialized mountain rescue groups of Portland Mountain Rescue and the Hood River Crag Rats lead and carry out all rescues on the mountain. The USFS and MHNH have no responsibility for these rescues, and in my experience, I have never heard of a climbing ranger assisting in a rescue on Mt. Hood. Both PMR and the Crag Rats are entirely volunteer run and donation supported and have demonstrated exceptional capability to handle rescues on Mt. Hood. They have never to my knowledge failed to carry out a mission on the mountain for lack of personnel or resources. The money for the climb fees goes to the USFS and MHNH, not to the entities involved in rescue: Portland Mountain Rescue, Hood River Crag Rats, Clackamas County Sheriff, and Hood River County Sheriff. The USFS has suggested that they will make a small donation of less than 5% of the revenue from permits to PMR and the Crag Rats which represents a minimal effect on the current operations of these groups and addresses a problem which does not exist: PMR/Crag Rats already have sufficient funding to provide more than adequate personnel and resources to respond to all rescues on Mt. Hood. By comparison, when asked at the Facebook outreach presentation how much of this fee will go to Recreation.gov, the USFS said they were unsure, concerning that this proposal is so poorly planned that they cannot answer a simple budget question like this, but it could likely be around \$8 of the fee which would be 40% of a single use pass. I believe the climbers would be outraged to know that over 8 times more of their fee is going

to maintaining a website than contributing to their rescue should something happen. Troubling is that the MHNH and the USFS has repeatedly brought up rescues as a justification for this fee leading many within the general public that are unaware of how rescues on Mt. Hood are handled and who is responsible for them to believe that this fee is needed as additional support for rescues. The USFS is deliberately using this ignorance to misdirect public funds from the public's intended target to the USFS's own purposes.

Climber Education

A stated goal of this proposal is to increase safety on the mountain through climber education. Per the USFS, an additional full time and one more seasonal climbing ranger will be hired with the stated purpose of advising climbers on the mountain about climbing conditions and safe climbing practices. These climbing rangers will not however be on the mountain when people are actually climbing. Common practice especially for the busy climbing season from April-July is for climbers start between midnight and 2AM in order be up and down from the summit before dangerous rockfall occurs by late morning. When directly questioned about this at the Facebook outreach event, the USFS acknowledged they had no intention to have climbing rangers on the mountain during the early morning hours to advise climbers on safe practices. My own experiences on Mt. Hood bear this out. In the 60+ times I have been in the crater of Mt. Hood, I have seen a climbing ranger exactly twice. Both of these instances the climbing ranger walked from group to group asking to see their permits and never once providing any safe climbing advice or information about route conditions. He even failed to mention to unsuspecting groups that they were about to walk over a dangerously thin snow bridge that was difficult to see from the direction they were coming from. As a member of PMR and a concerned private climber, I have countless times had friendly, nonjudgmental conversations with newer climbers to make sure they're aware of the current hazards on the mountains and how to safely deal with them, and I know of many other experienced climbers who do the same. It is completely unclear how two more climbing rangers walking around only asking for permits at times after standard climbing hours will lead to any improvement in safety on the mountain.

Also during the Facebook outreach meeting, when asked for how they will use the fees to fund resources for improving climber safety, the USFS stated that they intended to use the money to determine ways to educate the community. This is not how funds are raised. It is unacceptable to raise money with the intent of using it to determine how to use that money. There should be a clear plan and intent for how the public funds will be used and why the fees need to be set at the specifically chosen values. Instead, it appears we have an intent for the USFS to see how much money they can milk out of the climbing community by taking advantage of the popularity of Mt. Hood and use for whatever purposes they would like. Yet again we see the disgustingly poor level of planning done by MHNH and the USFS in this proposal.

Effect of Permits on Decision Making by Climbers

Permits and climbing fees have well known negative impact on the decision-making climbers. The frequently studied and referenced scarcity heuristic trap leads climbers to make overly risky decisions to try and accomplish a climbing goal when they believe they will have limited opportunities to do so. Many climbing and avalanche deaths have been attributed to risky decisions that came about as a result of this concern about missing one of a limited number of chances to achieve a climbing objective. By charging a single use day-limited fee, the USFS will make it more difficult for climbers to turn around when conditions are not right, weather rolls in, or they aren't feeling well due to the increased investment that they now will have to summit on that particular day. I personally know of several stories of friends climbing in dangerous conditions and getting themselves in trouble because they had already invested in a permit for that day.

Because MHNH and the USFS has not made it clear to the public that this fee is not paying for rescue, many will be left to assume that it will be used that way. When a climber believes they have already prepaid for their rescue they are more likely to call for rescue superfluously. This has been seen in a few high-profile cases on Denali and elsewhere. This will put greater demand on the volunteer rescue groups to support rescues that result from the USFS's fund raising. Climbers are also more likely to make riskier decisions if they feel their rescue has already been provided for and the resources are pre-staffed and available for them. This fee will unavoidably lead to poor decision making on Mt. Hood and that will have unfortunate consequences. Part of these unfortunate consequences is that rescue personnel will be put at additional risk when climbers make bad decisions about climbing in dangerous conditions. The rescuers of PMR and the Crag Rats are exceptional, but every time we respond to a call, we are putting ourselves at risk and especially so when weather or conditions are particularly hazardous.

Concluding Thoughts

This proposal was put forward by people not involved in the Mt. Hood climbing scene. It was proposed without fact-based justification derived by concerns of the public with regards to climbing on Mt. Hood. It is going towards purposes that do not benefit the Mt. Hood the public. Many climbing organizations exist that do work towards the stated goals of this proposal of climbing education and safety: Portland Mountain Rescue, the Hood River Crag Rats, the Mazamas, and many others. These groups who are intimately aware of the state of climbing on Mt. Hood and handle climbing education and rescue along with the community at large are not being involved deeply by the USFS in the process to understand what problems might exist and in what ways can they be best addressed.

In looking at the proposed Climb Fee for Mt. Hood, I'm left asking what problem is trying to be solved? As shown above this goal is poorly defined and inadequately researched. Following that, one is left looking at how this solution would lead to any safety improvements on the mountain and immediately sees nothing to be gained and in many ways negative effects on climber safety. We further cap this all with the USFS misleading the public in their justification for this new fee. This proposal needs to be immediately terminated and restarted with core values and goals made clear before any changes to the current system are made. Once those are established any future proposals should be grounded in research of climbing activity on Mt. Hood and other Cascade Volcanoes. Thank you for taking the time to read and consider my feedback and that of the climbing community.

150. I had the fortune to summit Mt Hood (4) times this year. I've also climbed multiple other permitted peaks in the northwest this season. The proposed Mt. Hood climbing fee scheme seems like a misguided attempt to raise funds without providing any meaningful benefit to the climbing community over the current system. The yearly cost is significantly more than other annual climbing passes in the region while details of new services provided are vague.

"The permit will fund additional climbing rangers to provide adequate climbing patrols and resource protection within the Mt. Hood Wilderness."

What is an adequate climbing patrol? Is it hiring (1) additional ranger who spends 30hrs a week in the office or is it hiring multiple rangers who will be patrolling the mountain during the night when climbers are active? How will these additional rangers improve safety and education other than checking permits?

Additionally, the permit will allow the Forest Service to provide better climbing education, improve sanitary conditions while reducing human waste, enable infrastructure improvements, and provide support for search and rescue groups on the mountain."

What specifically would the forest service do to meet each of these objectives?

Please provide a more thorough breakdown of how the program will be administered and how each aspect will benefit the climbing community and society.

151. Attached are my comments on the proposed recreation fees (letter below)

Facebook Live Event Comments:

Comment from Forest Service: Welcome to the meeting for Mt. Hood National Forest's recreation fee proposal. We'll start at 6pm. Please type any questions you have into the comment box here and we'll answer them towards the end of the presentation. Thanks for joining us!

152. Selling back freedoms smh

153. why are several FS roads and dispersed camp area being closed off to the public, is public land is it not?

154. Don't put in fees for areas that are currently free!!

155. The Forest Service needs to use existing fees from the NW Forest Pass to improve trailhead roads and to service trailhead bathrooms much more often. Let's add bearproof garbage canisters at trailheads to more popular trails, too.

156. Why are the fees necessary? Is this because the Federal Government has limited fund transfers to support public lands? If so, when did this occur and how much was the budget slashed?

157. your feed sucks

158. How far is the sign in sheet (permit) to the south mountain,

159. I'm a very happy user of the Northwest Forest Pass and am glad to contribute to the upkeep and infrastructure of our outdoor spaces.

160. If there are no improvements with existing fees from yearly passes, why add more? Let's see some value for dollar first.

161. The FS needs to request greater funds for recreation sites. The fees you charge for ANY site is basically double taxation as we all pay taxes to fund our PUBLIC lands.
162. No trail that I have ever been to has security services, a requirement for standard amenity recreation fees.
163. "Our goal here is to create inequity by charging all people the same fee." This limits low income folks who can go outside
164. Also, your connection is terrible.
165. The NW Forest pass system is double taxation. Adding and increasing fees will keep lower income folks from using their publicly owned federal lands. Do not increase any fees in this proposal.
166. Christine, exactly. We need more access for new trails and old ones to be developed. They won't do that. They are lazy mfs
167. If fees are requested because of growing pressure from public use, a solution besides holding our collective hands out, is to add more campsites and trails to disperse the public over more of the land. It has been too long since significant, new campgrounds and trails have been increased. Why always head for our wallets first?
168. My connection has been good so far.
169. We have an interest in you getting a better internet connection.
170. working fine for me
171. We are hearing only about a third of what you are saying.
172. Literally 30 people in this group right now. I suspect the next one will be the same. They need to have a weekday sessions as well
173. Please reschedule this hearing as it is not truly public when the public that is participating cannot hear what you are saying.
174. how much of the fees goes towards admin. pay? Response from Forest Service: About 95% of fees to work on the ground and stay on Mt. Hood National Forest.
Response from Forest Service: If you are having issues hearing the audio, we'd suggest shutting down your browser and navigating back to this Mt. Hood FB page.
175. Wow that was not an actual reply to what she said.
176. If we continue to add more sites to fee sites, pretty soon the entire National Forest will be off limits to low income people and to senior citizens. Endless! Response from Forest Service: Any new day use sites will accept the existing NW Forest Pass, so if you have a pass already you will be good to go.
177. Return Trillium Lake to the Forest Service so all fees go back into the forest service, not a vendor!
178. I agree there are so many people who would want to know about this
179. I wish more people were on this live
180. what are your proposed fee increases? Assuming this is in addition to the required forest service pass?
181. dont we already pay taxes to support these areas?
182. What other options have been explored for funding the Mt Hood NF? There are ski resorts on the mountain which pull in many people, are these available for gaining access for funds? Response from Forest Service: Ski areas do pay fees, but those fees focus on improvement and impacts at and adjacent to the ski areas. They do not pay for recreation costs across the Forest.
183. I have lived and recreated around the Mt. Hood NF for decades and have seen few improvements since they began the fee structure. Same at a Thousand Acres. The FS seems to be using the fees for using our own land as a vending machine that takes your dollars and gives you nothing!
184. Can we get the link for the proposed changes?
185. <https://tinyurl.com/3yb6xauw>
186. How much money will you spend on these upgrades and services to upkeep them and how much do you anticipate being in?
187. We need to see these comments
188. Is the proposed fee at ATV areas per car, per camp, per person?

189. As if the last two years allowed us to fully access the mt hood national forest especially the clackamas river ranger district
190. The ZigZag District needs to keep its Visitors Center open 7 days a week. Response from Forest Service: You can comment on individual recreation sites online here. Click on the Mt. Hood tab, and then scroll down to interactive map. Click on the site you're interested in and then comment in form that appears:
<https://usfs.maps.arcgis.com/apps/MapSeries/index.html...>
191. Why doesn't Mt. Hood request more recreational fees so there would be no need to double tax the public for using our public lands?
192. We continue as the audience to be unable to hear most of what you are saying.
193. We don't trust you tbh.
194. You also have TKO
195. How about adding an extra fee for extraction of finite resources to pay for recreation?
196. When volunteer groups show up to do trail maintenance, will they be charged the daily fee?
197. When volunteer groups show up to do trail maintenance, will they be charged the daily fee?
198. We need trails to Wallalute Falls, Frustration Falls, Lady Creek Falls, and the Sandy Glacier Caves.
199. thank you!!!! With passes covering the day use, I strongly support the fees!
200. Is there an upper limit on fees for camping? Pretty soon they will catch up with budget motels. .
201. how can you propose an increase now if you have no idea of the amount you want to increase the pass?
202. You don't know which is a problem. you most certainly had to have projected something
203. I've already submitted my comments on some of these sites, my big issue is with the proposed fees on the Lookouts (though I have issues with the rest of it too). The lookouts generate huge amounts of revenue as it is, roughly 20k\$ annually for Fivemile. But it's blatantly obvious if you've ever visited one that lookouts around the state are generally neglected by the FS other than changing the TP in the outhouse. Fivemile is taken care of largely by volunteers, and Clear Lake is staffed during fire season which funding comes from elsewhere I believe. It is rarely maintained during the winter. Raising fees on these seems like a way to get extra \$\$ because they are so popular. Money is never put back into them.
204. How will the Forest Service make these extra and higher fees equitable for low income and Senior Citizen recreationalists? How will they not be priced out of the Forest?
205. 95% of nothing is zero
206. Regis, this is crazy
207. If you haven't done the research to estimate how much revenue is going to be generated with these new fees, you haven't done your job right. This is like throwing mud at the wall and hope it sticks.
208. The ski resorts are charging \$900-1200. Who keeps them in check with the increases and do you see a higher collection from them?
209. Will you build any new trails? Like to the Mooney Tarn?
210. The Gifford is robbing us too
211. Strange that you would align yourselves with them when you don't in bigger areas.
212. Yes!!
213. Can you pick a specific site in the Mt. Hood NF right now and tell us in detail how current fees benefit that site? Then, could you say specifically how a new fee or higher fee would have tangible effects on it?
214. Same question, especially since Boulder Lake (for example) has a new toilet and still currently no fee, so clearly the fees aren't necessary to make improvements.
215. This promotes keeping your free permit stub so you can't track us
216. Is it a win if you can break even? Also where is the 5% going? Response from Forest Service: The 5% goes to administering the Forest Service recreation program at a national and regional level.
217. How much of the \$100 Trillium Yurt fee go back to the Forest Service?
218. \$95

219. so you plan on adding more fees but you do not plan to offer more opportunities?
220. That's what I'm hearing and it's super disappointing.
221. Not at all. This trail realignment talk is silly
222. How can we trust the USFS to not just bankroll these fees into the General Fund and show nothing for them (kind of like we see no value for \$ now)? Response from Forest Service: Fees from Forest Service recreation sites are governed by the Recreation Enhancement Act. When this legislation passed in late 2004, it created the budget framework to keep the money at the Forest level, rather than the general Treasury.
223. Yeah, maybe we can take some of the military spending and return it to something more enjoyable don't ya think?
224. Why don't you request more recreation funding when you do your budget requests?
225. How utterly sad.
226. Yes, the U\$ Fore\$t \$ervice . . .
227. One year from now . . . Trailhead toilets still overflowing, even bigger trailhead road potholes, and a credit card reader at every trail . . .
228. Brand new kiosks that will be shot up
229. Do Sanger trees get reviewed by Bark?
230. Danger*^
231. The Gifford Pinchot National Forest- U.S. Forest Service is doing per ATV which would've benefitted Hood. Best bet you'll see more atvs in hood as a result
232. OHV site fees are per car. Are they per day also? Response from Forest Service: Yes, the proposed McCubbins OHV site fee would be per day, per vehicle. (Vehicle you got there by, not by OHV.)
233. What percentage of the forest will still be free when this is said and done?
234. That web page does not have the link to directly submit feedback - only email. Response from Forest Service: Click on the Mt. Hood tab, and scroll down to the map view. Then click on an individual site to see the green comment box.
235. I did that, for Trillium Yurt for example - no link to comment.
236. What are the percentages Ryan?
237. You have too many questions
238. I'd pay more for access to Bull Run
239. So we need to go to Portland and protest this?
240. Don't our taxes that go to the Forest Service already cover general services like toilets and kiosks?
241. Is the Mt. Hood going to follow the Deschutes and other NFs and finally, finally, develop separate but equitable trails for snowshoes and Noordic skiers? Please!
242. So we all know, they can remove comments
243. The Oregon State Legislature has already been investing funding into trying to increase equitable access of outdoor recreation opportunities, and imposing more fees just seems to counter those efforts. If we want to see more diversification of users, we can't create more financial barriers to access.
244. Please make the recording of this hearing public. I would like to hear all of it again later. About half could not be heard. Thank you. Response from Forest Service: It will be posted on our main Facebook feed directly after the meeting ends.
245. Need to add a L to the last name.
246. Topher, someone has to ask the questions. I don't lick boots my friend.
247. Doug you have much to say, why don't you run for office since you seem to have much energy and interest here?
248. In your last budget request to washington how much did you request and how much was allocated? Response from Forest Service: The budget is determined/ requested at an agency-level. You can find the budgets, justifications, and Congressional questions for the last decade here: <https://www.fs.usda.gov/about-agency/budget-performance>
249. As Kameron mentioned, Congress makes its appropriations. If you don't like their decisions then write your members of congress and vote when it comes time to support those who align with your interests.
250. True, but the FS decides how they use it

251. Forestry fails to partner with volunteer organizations by placing tons of red tape. Couldn't better partnerships offset some of the costs your presuming to recoup from fees?

252. Oh I'd love an OHV Ranger at La Dee Flats, it might keep out the red necks leaving empty coors lite cans and fires burning.

253. What about tolls on select forestry roads? Higher fees for commercial use lower fees for poor

254. Do not increase any fees.

255. Could you please drop the email address in the comments section here? Response from Forest Service: SM.FS.MtHoodFees@usda.gov

256. They can only add red tape they can't actually make things happen

257. Any plans to allow volunteers to maintain historic buildings? E.g. Sandy Guard station?

258. Serge, they let that go into shambles

259. Again - there is no way to provide comments from the website. Response from Forest Service: If you zoom in on the map, there's a little hut-like icon at Trillium. If you click on the hut, a side bar opens up and there's a description and a little green rectangle. Click on that icon, and a comment form appears.

260. well this was a big waste of time.

261. yeah are these fees in addition to a pass or would a pass still cover it? Response from Forest Service: A NW Forest Pass will cover the proposed day use sites. NW Forest Passes do not cover campgrounds though. (The federal interagency Access & Senior Passes do have a 50% discount on camping. More info on passes: <https://www.fs.usda.gov/.../mthood/passes-permits/recreation>)

262. it is my understanding that a campground has separate fees from the northwest forest service pass. Ie: I have camped at a forest service campground and had to pay a fee for this - in excess of my annual forest service pass. I guess I am not understanding

263. NW Forest Passes never cover established campgrounds. You always pay an extra fee. They are used to access the public land. Response from Forest Service: You're correct- a NW Forest Pass only covers the day use fee at trailheads, picnic areas, and the like that have a fee.

264. The public land access (unless by commercial users) sits very low in priority list of politicians. It doesn't help them to be reelected, so why bother

265. I would argue that public land access sits low in the general public's interest and that there are more pressing issues. However, when we do vote billionaires and their related cronies into office who do you think they care about? Take a look at the policies that get over turned for corporate interests like Bears Ears and who overturned them. It is imperative to vote for people more sensitive to environmental issues and our public lands. This user pay fee is minimal and for Forest Pass holders will represent an almost insignificant impact.

266. Thank you for holding this forum. The work you are doing to maintain this public resource is appreciated. Not everyone wants to see more fees but there are many avenues to address this issue with federal government representatives. Once every two years we have the opportunity to vote!

267. You guys do such great work. These fee increases are a small price to pay to continue to be able to use the trails and enjoy the forest. Thank you for all your hard work!

268. So you do accept comments? Response from Forest Service: We do, in multiple ways! Check out our webpage for more information: <https://www.fs.usda.gov/goto/mthood/fees>

269. Do you have a copy of your 2021 annual report online? Response from Forest Service: <https://www.usda.gov/our-agency/about-usda/performance>

270. typical government agency. What exactly is the amount you are wanting to increase? Response from Forest Service: Specifics on the increases or new fees in this proposal are on our website: <https://www.fs.usda.gov/goto/mthood/fees>

271. Could you offer short answers and address more questions? This is a waste of time Response from Forest Service: If you'd like more simplified answers, please feel free to check out our webpage, which also contains an FAQs document. <https://www.fs.usda.gov/goto/mthood/fees>

272. yes, I know of your website what I'm rather critical of is the word salad and deliberate waste of time when live. It's a tactic to avoid many questions while failing to answer direct questions by filling the air with little substance.
Comment from Forest Service: You can comment on individual recreation sites online here. Click on the Mt. Hood tab, and then scroll down to interactive map. Click on the site you're interested in and then comment in form that appears:
<https://usfs.maps.arcgis.com/apps/MapSeries/index.html...>

Climbers Virtual Town Hall Meeting:

Comment from Forest Service: Please submit any questions or comments here.

- 273. What!? Lol. The north side sees little use compared to the south side
- 274. I won't buy a pass for a place I know I won't see a ranger
- 275. It is unique to the Oregon taxpayer that is already paying the NW Forest Pass, Snow Park Passes. I'm just now learning about this, but seriously this seems its penalizing a specific group of people who ly won't reap the benefits of a Yurt.
- 276. Why is the annual option so high? \$100? Shasta only charges \$30.
- 277. How long before they start restricting the numbers of climbers?
- 278. PMR has always been stellar and how much of this fee would trickle down to them?
- 279. Law and order is the new motto
- 280. Why charge a fee at all? If the reason behind this is safety for climbers, why not require a 'license' to go above 9k feet. They will have to take a course to prove they can use climbing equipment with proficiency. Then issue them a 'license'. This ...
- 281. How will rangers help prevent accidents on the mountain? The way I see it, if they aren't patrolling as early as 11PM to 5 AM, then they won't be able to stop inexperienced climbers from trying for the summit.
- 282. Most climbing happens on snow... How much impact climbers have vs. 2 huge ski resorts...
- 283. how would having to have a permit and staff to police the mountain "take more care of it"? just wondering, cause in my experience the people that are summiting have done research and care about the mountain just as much as yall do. i know there are som...
- 284. How much of the fees does Booz Allen Hamilton keep? They are a publicly traded company.
- 285. Climbing it to death? People are literally walking on snow Response from Forest Service: Much of the human impact is human waste and trash.
- 286. people can buy thier own wag bags for \$2. Im not paying \$100 for a poo bag.
- 287. The actual language of the FLREA defines a special recreation permit as "specialized recreation uses of federal lands and waters, such as group activities, recreation events, motorized recreational use." There is no "including but not limited to" typ...
- 288. How many jobs is this creating and with what pay rate?
- 289. Huh... The restroom is there, was there since Wy'east lodge was built... The FS just decided not to maintain it
- 290. 24 hour bathroom? Who's going to monitor it? I can see it getting wrecked
- 291. The problem with poop isn't at the trailhead, it's near the top of the mountain. Are you going to build a restroom up there?
- 292. NONE OF THIS MAKES IT SAFER. ITS JUST A MONEY GRAB.
- 293. wouldnt a free class that promotes public safety be more efficient than a pass?
- 294. Your idea of equity is confusing. One fee for all is not equitable. Low income
- 295. You need to charge higher fee's for recreational use of the lakes in the national forest.. I feel sorry for you guys who have to clean the garbage everyone leaves up there..
- 296. Also, why pay \$5 on a regular trailhead for the facilities, and somehow \$20 if it is near Timberline. But... If you to build restrooms... Put one at the top of Palmer lift
- 297. How much money does the FS project to get from this?
- 298. I would to know 1 climber that thinks this is a good idea. Anyone?

299. Presumably a "fee staff" has a direct incentive to promote adding more fees?
300. An annual pass for Mt Rainier is currently \$53 for ages 26+... considerably more services provided with that fee, though NPS different funding source than Nat Forests.
301. i hope you include the comments from instagram in your comment pool!
302. i love the stoke of keeping the mountain clean and safe, but at the end of the day resources to help people understand the importance of packing in and packing out, checking conditions, etc seems more helpful than having to pay
303. just saw a lot of climbers respond on there, would be cool to hear from the main group of people doing it
304. jeesh. how many levels are we going through here?
305. Enforcement by helicopter?
306. If PMR, crag rats, and clack co does less rescues then what will they tell their funders? Will this eventually make their services decrease?
307. Climate change climbing
308. Accidents happen, making the mountain even more accessible will amplify the chances for mishap.
309. It seems the proposed fees will be a barrier for newer climbers, particularly those of lower income. What will stop this permit fee system from simply making Mt Hood a less crowded experience/playground for those with more disposable income?
310. do you genuinely believe having a permit will mitigate accidents? if thats true i am curious how. every time im up there im stoked to see others as well, never feel distracted or more at harm
311. I'll be down with some of those funding went to scholarships to help folks go through climbing classes
312. how would having a permit make you realize you arent equipped
313. Nick, please explain how money makes it safer?
314. How will the permit help with making better decisions in the moment?
315. PMR s this idea because it gives them more money
316. the way i see it is its the oregon coast and surfing. because of covid and social media so many people are outside. but we arent going to charge to use the ocean to be safer - we shouldnt charge to climb a mountain.
317. Is climbing on less busy days mean that you'll do it in a white out?
318. IF the weather permits. Not the people
319. How will a permit fee make things safer for climbers, if safety is the issue? A climbing ranger and PMR can't babysit everyone. It seems you're just putting up an economic barrier.
320. This is all about money and someone scratching someone's back.
321. Are you going to charge more money for blue bird skiing days too? I mean, if it's going to help keep those lines lower...
322. They are currently not talking about limiting permit numbers so it won't help with congestion
323. i would love stats on how much money this would make yall - just feels wrong
324. Ive never heard of a permit making people want to get out and enjoy the thing that once didnt have a permit
325. Thanks Nick and PMR, none of this is easy and I don't envy those making this decision.
326. yeah how much money we need numbers
327. There's no way to charge a \$20-100 fee and not have it further marginalize the already marginalized.
328. Freaking rec<dot>gov can't even make a feature that requires watching a video or answering a quiz before selling permits... No hope for helping marginalized people. It's all just more \$\$\$ for that corporation
329. Thank you, Nick.
330. Do these people honestly think that newbies are going to climb the northside of hood?
331. i do appreciate all your work and rescues and think this is all very important, but i think money going towards resources on educating inexperienced climbers would prevent more accidents
332. This fee system is going to encourage climbers and future climbers to go elsewhere. I imagine there will be more deaths and serious injuries from attempting to climb Jefferson. At least with Hood, they have EMS nearby.

333. more than 10000 climbers supposedly climb Hood a year. Some people are about to get a raise!
334. Let's be clear, the rescue groups do not need this money. Do they it certainly but they are not in need of it. They've been funded without it for decades
335. for that
336. does the public actually have a say in this? whos making the final decision?
337. John sounds the only person that knows whats up!
338. Good point about 10000'... It is also common to hike to Devil's Kitchen as a conditioning hike or to get a closer look at the summit area
339. Thank you John.
340. Thank you Nick and John. Definitely important to hear from the SAR organizations that deal with the worst of the problems.
341. you can also look at all the comments here. No one wants this
342. Public land MUST stay public
343. Is there a projected budget for this program? If so, what is the expected income from the program? If no such budget exists, why not?
344. Looks the public doesn't it
345. what about liability? will you take responsibility then for the deaths or injuries of people with a permit?
346. since the claim is it will help keep them safe
347. thats a GREAT question
348. Can you share the initial budget estimates?
349. Those who sacrifice freedom for safety deserve neither
350. So us that live on the mountain you dont care about because we are such a small group? but we are the ones that can forecast since we are on the mountain...
351. Will the forest service have a gear rental space in the lodge? So that those who show up under prepared can have access to good equipment
352. but no so hard to gather money...
353. What is the fine for climbing without a permit?
354. Will recordings of this session and the 6pm session be available? Response from Forest Service: Yes, they'll be on the Forest's main FB feed as soon as the meeting concludes.
355. so it isnt about the safety
356. So you can get a permit and do whatever you want still?
357. So you mentioned there's a "demand" aspect to the permit and fee proposal, which is why you've developed the proposal to be so much more than Shasta. I don't see how this doesn't adversely and disproportionately impact those with lower incomes.
358. so you cant post weather updates on social media without the funds from a permit?
359. Was there any consideration to a group permit?
360. \$2 fee per permit
361. So the \$20 is inclusive of the BAH fee?
362. Please fix Forest rd 48! Please! Please! Please!
363. So it sounds the information and education you plan to provide is just conditions reports, etc on your Facebook feed? Is that really an effective means to educate? Response from Forest Service: Most of the education will be through direct communication with folks who've gotten a permit via email, at climbing trailhead, & in person. Also, we'll be able to increase climbing conditions reports that will be shared in many ways digitally and poste...
364. Since when has the FS been an expert in climbing safety or techniques? What credentials will the people dispensing this information possess? AMGA Alpine Guides?
365. Please don't do this. These kind of activities are already incredibly expensive as is.
366. **budget question^^thank you

367. Have you considered not requiring the permit until above Devil's Kitchen on the south side?
368. Will Eric Brahms receive any special funding since he is the one who provides way more data than anyone else?
369. Can you provide those places so that people are aware of them pier. Especially if you're finding that people are going up without the right gear
370. im sad only 32 ppl are here and apparently 10,000 ppl climb a year. would love to hear what they have to say
371. Would you be able to quantify with a real-life metric the effectiveness of this proposed program?
372. what about group climbs. i was truly amazed how many groups of ten or more hiking this last winter/spring and the hiking groups bringing up these large groups?
373. How will guides (outfitters) pay the fee for their clients outside of their guide permit?
374. please dont do this
375. I support education and increasing safety, but, it seems there are better ways to achieve that without putting up an economic barrier. Why is the additional education, etc you plan to provide really requiring so much more revenue? We have an urba...
376. Question: Name 1 person besides a ranger that wants this permit? There is already a permit, but now we have to pay.
377. Any considerations for permits for community organizations, particularly ones that provide climbing education, such as Mazamas?
378. Why not just permit and police pearly gates and old chute only? Those are predominantly where the accidents happen.
379. What does enforcement look if the permit resides on a smartphone and there are no physical permits attached to the climbers. Do you expect the Rangers to make contact with every climber they see to confirm they have a permit? How can I as a climbe...
380. Please don;t approve this, no one wants it.
381. This is already happening folks. This is just marketing before it does
382. Thank you, all!
383. But... climbers start early, at night, during the climbing rangers' non work hours, how do you provide that in person education before they climb? Response from Forest Service: One way is when a climber purchases a permit in advance on Recreation.gov, they include an email, so conditions reports & climbing education resources could be emailed in advance.
384. It's strange that the other price increase that I just saw did not have that same feature where you can comment directly on the page. Wonder why that is? Response from Forest Service: It does have the same feature, please feel free to check it out!
385. Any attorneys in this feed want to do some pro bono work and go after the NFS? I think there might be a few avenues to fight... alas, the government will probably win in the long run.

Comment #65

Dear Forest Service,

As the mountain rescue organization responsible for the Hood River County portion of Mt. Hood (everything east and north of the Hogsback), the Hood River Crag Rats would like to convey the following observations and opinions regarding the proposed new permit system for climbing Mt. Hood. Individual Crag Rats hold a diversity of personal opinions and are welcome to express them individually. This letter represents the unified opinion of the officers and is the position of the organization.

First, we understand that Mt. Hood needs a plan. All the other Northwest volcanoes have one, so Mt. Hood, as the most popular of them all, is due. Our goal is simply to emphasize a few points that we want to draw attention to.

1. South Side climbs versus the rest of the mountain. The vast majority of climbing takes place on the south side. Therefore the regulations (and patrolling) will logically be focused on the south side. While we feel that the rest of the mountain should be as unregulated as possible, we don't want inexperienced south-siders to move to wilder, more dangerous parts of the mountain in order to escape fees. And we also know that many north-side climbers descend down the south side. Therefore we regretfully feel that permits should apply to all summit climbers regardless of route.

2. Permits do not guarantee rescues. Because all rescues on Mt. Hood are carried out primarily by all-volunteer services, we feel it's vital that permits do not raise any expectations of rescue. This must be made crystal clear in the permitting process.

3. No day permits. We feel that issuance of day permits or time-bound permits would contribute to climbers pushing themselves through bad weather, snow, or personal conditions to complete a climb on an arbitrary schedule. This is very dangerous. An annual permit would eliminate this problem. But the annual permit should be at a reasonable cost because most people only climb the mountain once in a year. We feel that \$25-\$40 is a reasonable range.

4. Above 10,000 feet only. Many people ski from the Hogsback or Snowdome without summiting. They should not be charged for using the mountain. By placing the floor of the permit at 10,000 feet, only summit climbers will be charged. Also, it should be noted, most accidents take place above 10,000 feet.

5. Crag Rats and Portland Mountain Rescue members exempt from permit. People from these organizations are on the mountain at most times performing critical functions, whether it's patrolling or rescues. They should get free permits as recognition for their services.

6. South Side infrastructure needs attention. The current infrastructure for climbers needs serious improvement. We will be happy to supply suggestions for how it can be made more useful for all.

Thank you very much for considering our feedback. We would be delighted to work with you as much as you find useful.

Comment #87

Thank you very much for conducting the current outreach on the proposed changes to fees and permits within Mount Hood National Forest. As an avid backcountry hiker, who is active in the backpacking community, I would like to provide input to the process.

(a) With respect to the fee increases My greatest concern with the fee increases and the increasing reliance on recreation.gov is the potential impact on marginalized communities. Fees create barriers as well as the requirement to have on-line access and, especially smart phone access to more disadvantaged communities.

I am currently conducting a survey of hikers that have successfully completed the Timberline Trail this year, and although this is not complete, Of 99 hikers reporting their race, approximately 95% are self-reporting to be white.

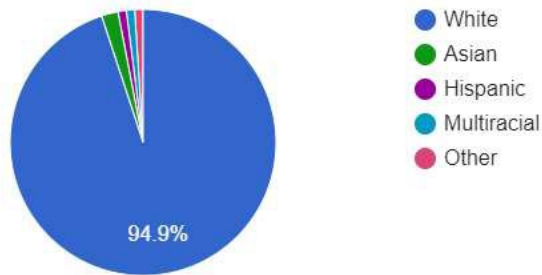


Figure 1 - Response to race question for Timberline Trail (2022)

Although the proposed changes do not directly impact the Timberline Trail (especially if starting at Timberline Lodge) – these results are indicative of the current diversity of recreation users.

While it's understand that additional funding is required to maintain infrastructure within Mount Hood National Forest as recreation use increases, I would encourage the Forest Service to look at ways to increase outreach and support a broader base of users.

(b) The proposal mentions increased security. There are several trail heads that have a notorious reputation. The Salmon River West Trail Head is probably top of the list. This trail head is already a fee required trail head. Top Spur and Lolo Pass are not far behind. It is very common when hikers ask for recommendations for hikes in the forest that they are warned off these areas because of the possibility of car break-ins. It would be good to understand specifically what the Forest Service can do to increase security in these areas. trailheads, but it may be possible to look at other technology solutions such as cameras (where there is some internet access) and fake cameras.

(c) It is good to see that the Northwest Forest Pass continues to be honored at all these sites and this continues to be an incredible value.

(d) With respect to the proposed climbing permit. Some of the basic concerns around equity apply here as well.

(e) I would like to see the Forest Service consider a group permit. There are some truly remarkable leaders in the climbing community – for example Adam Coberley, from Oregon Hikers and Climbers, who regularly teaches and takes groups up Mount Hood. This would often be above the 9500' level. Taking both training and summit hikes into consideration – single permits could be a severe limitation on such efforts – that are focused on safely introducing people to Climbing.

Again – I would like to thank the Forest Service for their openness in the public comment period and in the work you do for protecting and advocating for forest use.

Comment #98

Dear Mount Hood National Forest,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership for National Scenic Trails dates to the 1968 National Trails System Act (NTSA), and it is reinforced by PCTA's Memorandum of Understanding (MOU) with the Federal and State land management agencies. We take seriously our role of working with the Forest Service to ensure the best possible management of the PCT, and the unique experience it affords trail users, as described in the NTSA and Forest Service's PCT Comprehensive Management Plan.

PCTA supports the proposed fee increases because we know the money is needed for campsite maintenance, wilderness restoration, education, and trail work. Further, without those funds, we understand it would be difficult for the forests to maintain consistent services with the increasing demand in the most popular places. While we think it's reasonable to increase fees as costs and service demands grow, we would like to acknowledge that fees can create a barrier to participation for some potential forest visitors.

With the proposed fee increases, users would be charged only at the most popular trailheads, several of which are along the PCT. Considering that the Northwest Forest Pass will cover the new proposed fee areas, these increases seem reasonable. There are still many trailheads to choose from in the Mount Hood National Forest that remain free.

While we are supportive of the fee increase, we are also concerned about making sure the fees don't discourage people from visiting the Mount Hood National Forest. PCTA suggests working with partner organizations to develop systems that will allow people to have access to the fee sites and eliminate potential barriers to visiting the forest. We are glad to see programs like Fee Free Days, Every Kid Outdoors, and the various Interagency passes for seniors, veterans, and people with disabilities. The PCTA is committed to collaborating on these solutions, and we hope the public will contribute ideas.

PCTA wants to acknowledge existing programs that help give access to these sites. For those who have the capacity to serve as volunteers on the forest, there are opportunities to earn free Northwest Forest Passes and Interagency Volunteer Passes. PCTA and other trail work volunteer organizations in the region currently have incentive programs for volunteers who serve a certain number of hours annually to receive Northwest Forest Passes as a reward for their service. PCTA awarded 363 of these passes in 2021, giving those volunteers access to all these fee sites for the year as a thank you for their time and effort on our trails and in administrative roles.

Thanks again for the opportunity to collaborate. We look forward to more conversations on this proposal.

Comment #101

Dear Mt. Hood National Forest Recreation Specialists:

I wish to comment on the 2022 Climbing Permit and Fee Proposal.

Climbing permit fees should be used only for supporting climber recreation and not diverted to non-climb sites. The NW Forest Pass needs to be accepted as payment. New fee sites should not have restrictions on the number of visitors.

Annual pass holders should receive a discount for the Trillium Yurt, Fivemile Lookout, and Clear Lake Lookout. This rewards people who've invested in an annual pass and incentivizes more annual pass purchases.

Recreation.gov should not be used as an exclusive agent for fee collection at any of the Forest's recreation sites. It is too discriminatory, posing difficulties for people without computer skills, those who lack computer or Internet access, seniors, people of color, people with handicaps that make computer use difficult, undocumented residents, non-English speakers, and veterans, many who eschew smartphones or can't afford them.

There has been a disturbing trend of making access to public lands less equitable in recent years. We're seeing more visitor quota restrictions and permit systems that discriminate against disadvantaged groups. The agency needs to put equity first in all land access decision making. People who have paid taxes all their lives or worked to defend our country are finding

themselves unable to enjoy public land, a resource that belongs to them and provides comfort in stressful times. We must reverse this trend and make our lands open to all.

Fee revenues need to be put to use immediately for improving the trail system, not accumulated in a carryover account. I oppose a fee for the Fifteenmile Trailhead. This is a low-visitation site at a remote location, and most visitors aren't looking for a developed facility.

If a fee is implemented at Bonney Meadows, the road needs to be improved. It's been a minefield for decades. A major cause of congestion at trail sites is the lack of enough trails to satisfy growing demand. While the existing fee system makes spending fee revenue at non-fee sites impossible, I suggest the agency find creative ways to resolve this. One idea is to create new trails and make them fee sites to begin with. This would add more capacity to the trail system and provide funding for it.

Thank you for the opportunity to comment,

Comment #125

Dear Ms. Loftsgaarden:

Thank you for the opportunity to comment on the proposed fee changes for Mount Hood National Forest. Our comments are limited to the proposed trailhead additions to the Northwest Forest Pass system. While TKO supports trailhead parking fees as a tool for managing crowding at our most popular trails during peak visitation, the long term goal is to restore adequate funding for the Forest Service that would allow free public access to most trailheads. This reflects TKO's mission to actively remove physical, financial and cultural barriers to access to our public lands, especially for BIPOC Communities.

However, in the near term we do support modest, fee-based trailhead parking permits (including the Northwest Trail Pass) as a way to ensure that our trailheads remain accessible, welcoming and maintained, especially when the revenue from permits is significantly dedicated to trails in the areas where passes are purchased. This is largely the case for Mount Hood National Forest, where we know that 95% of the permit fees collected locally are dedicated to work within the forest. Therefore, we do support the addition of these trailheads to the Northwest Forest Pass system, as proposed:

Lolo Pass Trailhead
East Fork Trailhead
Bonney Meadows Trailhead
Badger Lake Trailhead
Little Badger Lake Trailhead
Fifteenmile Trailhead

We especially support the provision of toilets and picnic tables at these sites that will make them friendlier and more welcoming to young families and new visitors to the forest. We also support the proposal to maintain gravel access roads to these trailheads that will be passable to passenger vehicles – removing another potential barrier for visitors new to the forest. This is particularly helpful for the Bonney Meadows trailhead, where the access road has historically been impassable to passenger cars, and therefore prevented most visitors from having access to this site.

In addition to the six trailheads in the Forest Service proposal, we recommend adding a relocated Vista Ridge and the Elk Cove trailhead to the Northwest Forest Pass system as part of this proposal, consistent with TKO's North Side Vision for trails in the Mount Hood Wilderness:

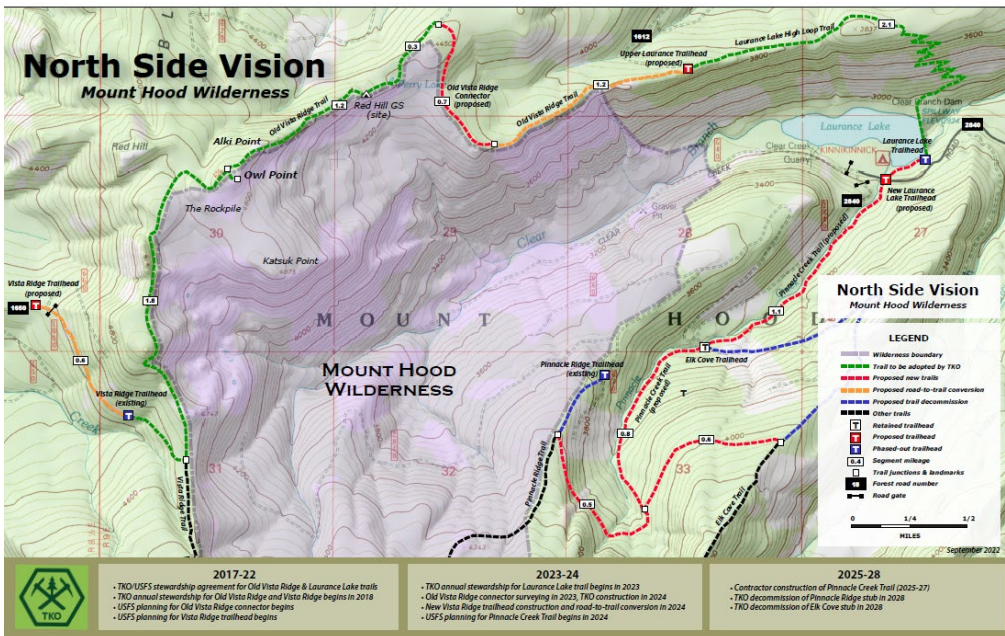
TKO proposes moving and improving the Vista Ridge trailhead (see attached concept) to a more suitable site approximately ½ mile north of the existing, unimproved trailhead, including trailhead amenities funded by adding this site to the Northwest Forest Pass system. TKO has a cost share agreement in place to maintain the Old Vista Ridge Trail (No 626 A) in perpetuity, and we have also maintained the Vista Ridge Trail (No. 626 since 2018 with regular logouts by our volunteer crosscut crews. TKO proposes to work with the Forest Service to convert the ½ mile of road from the proposed new trailhead to the existing trailhead to become part of the Vista Ridge Trail, and add this converted trail to our cost share agreement for ongoing maintenance.

In our North Side Vision for Mount Hood (see attached PDF), TKO also proposes consolidating the Elk Cove (No. 631) and Pinnacle Ridge (No. 630) trailheads with new connector trails. This proposal would make the Pinnacle Ridge trail more accessible by allowing visitors to avoid the final two miles of rough road to the existing Pinnacle Ridge Trailhead, while also creating a hiking loop that links the two trails. It could allow the Forest Service to consider decommissioning this steep section of road, as well. TKO would work with the Forest Service to construct the new connector trails as part of this Proposal.

In the longer term, we envision a relocated Laurance Lake Trailhead and Pinnacle Creek Trail (shown in our concept) to further improve trailhead access and the hiking experience in this area, though more work is needed to determine if these concepts are feasible. In the near term, we would also like to move forward on other elements of our North Side Vision, including expansion of our cost share agreement to include the remainder of the Old Vista Ridge Trail and an extension of the trail to the Upper Laurance Trailhead. This connection would provide paved road and Kinnikinnick Campground access to Old Vista Ridge and Owl Point as well as a new backpack loop circling the north side of the Mount Hood Wilderness. We look forward to working with the Forest Service to continue bringing our North Side Vision to reality.

Thank you for your partnership and the opportunity to comment!





Comment #127

Dear Forest Service:

We are writing with comments on the Special Recreation Permit Proposal as noticed at 87 Fed Reg 54451 (September 6, 2022) (the "Notice"). Although the proposal covers numerous recreational sites, our comments are limited to the proposal to require a permit and to impose a \$20 fee for individuals climbing Mt Hood (the "Climbing Permit Proposal"). We understand from your website that the fee and permit requirement would apply only above the elevation of 9500'. The Notice states that the Forest Service intends to apply funds raised through the Climbing Permit Proposal "to provide daily patrol along the climbing route, improve climber education, support search and rescue, and reduce human impacts on the natural landscape." These comments assume these points will be features of the permit program even though not articulated in the Notice.

As an organization and consistent with our public safety mission, PMR supports establishing a permit program for climbing Mt. Hood because we believe it can improve safety. As set forth below, we have a few concerns and suggestions for advancing this safety objective. At the same time, PMR's members are all recreational climbers. In their individual capacities, some of our members question whether a permit program is necessary, are skeptical about how the funds will be spent and believe that the Forest Service should do more to improve the climbing experience. Consequently, some of our members may submit comments in their personal capacities that do not support the proposal.

Portland Mountain Rescue

Portland Mountain Rescue (PMR) is an all-volunteer search and rescue unit accredited by the Mountain Rescue Association. PMR is dispatched by the Clackamas County Sheriff Office ("CCSO") and is an institutional member of Clackamas Search and Rescue. We have approximately 75 field deployable rescuers with an average tenure of 10 years. We recruit rescuers from the local climbing community. New recruits are selected through a screening process and field tryouts, after which they must complete a two-year training academy through which they learn specialized rescue skills specific to high angle and alpine environments. Our rescuers train continuously on rescue and medical skills and must meet annual training requirements to remain field deployable.

Through CCSO, PMR has primary responsibility for rescues on the west side of Mt Hood in Clackamas County. The Hood River Crag Rats (also accredited by the Mountain Rescue Association) are dispatched by the Hood River County Sheriff Office and have primary responsibility for rescues on the east side of Mt Hood in Hood River County. PMR regularly

supports the Crag Rats on their missions, and the Crag Rats regularly support PMR on its missions. The members of both units have extensive knowledge of climbing conditions on Mt Hood and regularly climb the mountain across all the popular routes. Together, PMR and the Crag Rats embody the entirety of knowledge and experience performing search and rescues in the proposed permit area above 9500'. From this knowledge base, we offer these comments on the Climbing Permit Proposal. PMR's mission is to save lives through rescue and mountain safety education. All of our comments come from the perspective of advancing this mission.

A. The Permit Program Should be Designed to Improve Safety for Climbers and Rescuers

1. Permit program and fees should be used to improve climber preparedness. Every year, PMR responds to climbing accidents in which lack of preparation was a primary cause. Sometimes, hikers spontaneously decide to continue into technical terrain without the appropriate gear or skills. Sometimes, climbers proceed upward in deteriorating weather without having checked the mountain forecast. Other times, they unwittingly climb into dangerous avalanche conditions, when clear and detailed avalanche forecasts would have warned them not to.

The Forest Service has indicated that permit fees will be used to fund a full-time climbing ranger function on Mt. Hood. The rangers' first priority should be safety education. The climbing ranger should establish a respected presence on the mountain every day when conditions allow. That presence should have a tone of helpfulness and encouragement, not enforcement, that will avoid barriers to communicating a safety message. We hope the climbing ranger will have the opportunity to make personal contact with many climbers and discuss with them their level of preparation. We encourage the Forest Service will find other ways to use the permit program to educate climbers about current weather and snow conditions.

2. The permit program should be designed to reduce dangerous congestion. Recreational use of the upper parts of Mt Hood has increased dramatically over the past decade. In particular, advances in back country ski equipment and promotion of that sport have increased the number of individuals climbing high on the mountain seeking untracked or extreme ski lines. This increase in ski traffic is apparent not just during the traditionally busy climbing season of May and June, but also throughout the winter. A sunny weekend day in January might see 250 people recreating on the upper mountain. Similarly, the popularity of climbing Mt Hood during the less severe weather of May and June has noticeably increased. Weekend days bring long lines of climbers trying to ascend or descend through the narrow and technical chutes of the upper crater. Although it is not safe for climbers ascending or descending to pass climbers moving in the opposite direction in these chutes, lack of patience with the congestion often results in such unsafe practices. Each year, this congestion is a factor in causing falls that trigger rescue missions or body recoveries.

The Forest Service has expressed the belief that the mere existence of a permit requirement and fee will discourage some people from climbing Mt. Hood, but we do not expect the reduction to be significant. Your staff has indicated that the permits will be available on-line and may be purchased the same day as a climb. This relatively convenient permit process likely will not deter most would-be climbers. Therefore, we are not optimistic that the resulting reduction in the number of climbers will substantially reduce the congestion hazard. Accordingly, we encourage the Forest Service to consider other ways to reduce congestion, such as encouraging climbers to schedule their outings during lower use times, such as mid-week.

3. The Forest Service should not suggest that permit fees pay for search and rescue. From the notice, we understand that the Forest Service intends to use some of the permit fee income for search and rescue. This statement may create an impression that permit holders have paid for rescue service and have a right to expect rescue when they are injured or otherwise distressed. Based on our discussions with Forest Service personnel, however, we understand that the permit fees will produce very modest funds for search and rescue—funding that would not make a significant difference in PMR's annual budget and would not result in any change in our response times for rescues or our ability to perform rescues in

challenging conditions.

PMR (and the Crag Rats) is staffed entirely by volunteers and funded entirely by donations. The proposed permit area on Mt. Hood is wilderness. There are no rescue teams staged on the mountain with immediate readiness. When CCSO dispatches PMR for a rescue, our rescuers must leave their jobs or other activity, grab their gear, water and food and drive from Portland (or further) to Timberline Lodge. At Timberline Lodge, they must form a plan, select specific rescue gear for the mission and assemble field teams. When they finally enter the field, they must climb to the distressed party's position with heavy packs of gear for rescue and evacuation. All that takes many hours. Yet often, the first words from the distressed party when we reach them are "what took you so long?"

When climbers expect rescue or believe that rescue services are funded by their permit fees, they may take risks that are inappropriate in a wilderness environment. After a traumatic incident, the expectation that help is on the way may cause them to fail to take measures to care for themselves during the eight or more hours required for rescuers to reach them. As a result, uninjured members of a distressed party may require rescue in addition to the original patients. Paradoxically, the expectation of rescue may actually increase the probability of injury or death.

We request that the Forest Service emphasize to permit holders that the Forest Service does not provide rescues and that the permit fee does not entitle the permit holder to rescue services. The proposed climber education program should explain that volunteer rescue services may take a day or more to reach a distressed party and that the party must be prepared with their own shelter, water and food to stay healthy while waiting for Rescue.

4. Permit program should include a rain check feature. Over and over, we have rescued injured and lost climbers who knowingly proceeded into dangerous conditions because that was the day they had scheduled on their calendars. Sometimes, these are people who traveled from outside the region and were reluctant to abandon the time and resources they already had invested in the climb. This behavior of succumbing to heuristic traps has been well documented as a common cause of recreational accidents. See, e.g., I. McCammon, Evidence of Heuristic Traps in Recreational Avalanche Accidents, International Snow Science Workshop (2002; Penticton, B.C.) <https://arc.lib.montana.edu/snow-science/objects/issw-2002-244-251.pdf>

We are concerned that requiring climbers to purchase a permit for a specific 48-hour period will create a new heuristic trap that will cause climbers to be even more invested in their climb and less likely to retreat when they encounter deteriorating weather, unsafe snow conditions (ice or avalanche risk) or personal fitness or preparation issues. This potential effect of the Climbing Permit Proposal works against the Forest Service's stated goal of improving safety.

To mitigate this potential effect, the permit program should include a rain-check feature that allows permit holders who do not summit to obtain a permit for a later date for no additional fee. For example, the program could include a feedback loop by which permit holders can report that they did not summit (for any reason). The permit system should then give them the option of applying their permit fee to a later date.

We recognize that such a feature would create opportunities for abuse by climbers who may misrepresent that they aborted a climb for the very purpose of obtaining a free permit for a second outing. We believe, however, that this potential for abuse is low. Based on our observations, most climbers on Mt. Hood venture to the upper mountain only once in a season or a lifetime. We expect it will be rare that a climber abuses a rain check feature when they achieved their objective on the first outing.

5. Permit program should be consistently enforced around the entire mountain. Most of the climbers on Mt. Hood start at Timberline Lodge and proceed up the mountain to the Hogsback and then along one of several well-established routes

through chutes in the upper crater. Accordingly, we expect that the Forest Service's efforts to enforce a permit requirement will focus on these popular routes. If climbers perceive that the permit requirement is only enforced on the popular south side routes, that may be an incentive for climbers to avoid the permit fee by climbing less popular routes on other parts of the Mountain.

We are concerned that such an incentive could encourage climbers to pursue routes that pose technical challenges beyond their skill level and could complicate rescue efforts. Although all routes to Mt. Hood's summit are technical and include significant objective hazards, alternatives to the popular south side routes tend to be more committing, and higher skill levels are necessary to attempt them. All these alternative routes are longer and more remote, which for some routes is the reason they are considered more challenging or dangerous. Rescues on these alternative routes require more time and resources and necessarily pose greater risks for rescuers.

To avoid this potential effect of steering unqualified climbers to more difficult routes, the Forest Service should ensure consistent enforcement of the permit requirement throughout the permit area.

6. Permit fees should help fund education programs. We understand that the Forest Service intends to use fees from the Climbing Permit Proposal to help fund climber education efforts. We have not seen, however, any specific information about the education program contemplated. We encourage you to consult with PMR, the Crag Rats and climber education organizations like the Mazamas and Timberline Mountain Guides as you develop and promote that education program.

B. Permit Program Should Include Mitigation of Barriers to Populations That Are Under-represented in Backcountry Recreation PMR supports access to the backcountry for everyone, including removing barriers that may prevent recreational access for disadvantaged and under-represented populations. A fee-based permit necessarily creates an additional, and potentially substantial, barrier to access to the upper mountain. While this barrier may be justified to improve safety, it may have the negative consequence of further frustrating people with limited financial resources or individuals who historically have not had outdoor recreational opportunities. To mitigate this barrier, the new permit fees should be applied to fund programs designed to create opportunities for under-represented groups to enjoy recreation on Mt. Hood. Such programs might include outreach to under-represented groups, special events to attract such groups to the mountain, educational programs to help individuals build the skills and confidence to climb Mt. Hood, and fee waivers for low-income households.

In this context, we also are concerned by the \$100 fee for an annual permit. A fee at that level will be a barrier for many people who wish to climb or ski high on the mountain more than a few times each year. We are particularly concerned that this cost will be prohibitively expensive for low-income individuals, which include many populations that are under-represented in backcountry recreation. We note that an annual permit for Mt. Rainier is only \$53. An annual pass for Mt. Shasta is only \$30.

C. Permit Program should be used to gather data about climbing Mt. Hood, and the Forest Service should refine the program within two to three years based on that data. You have told us that the Forest Service lacks reliable data about how many people attempt to climb Mt. Hood and when and where they climb. And you have represented that the permit program will be used to build a meaningful database of such information. For the permit program to be effective long term, it will be important to analyze that data and refine the program. For example, the data may support a decision to change the elevation at which a permit is required, whether the permit fee is set at an appropriate level or whether a quota should be established during certain times to reduce congestion. We hope that the Forest Service will involve PMR and other organizations in the analysis of the data and in evaluating possible changes to the program.

D. Search and Rescue (SAR) Volunteers Should Receive Free Annual Passes PMR and the Crag Rats, the two units that

perform all SAR missions in the proposed permit area, are staffed entirely by unpaid volunteers and are funded entirely by donations. These volunteers devote hundreds of hours each year to training and performing rescues specifically in the proposed permit area. In addition, they regularly climb the mountain as personal recreation, all the while amassing knowledge of routes and conditions.

This regular training and ongoing accumulation of experience on the mountain is critical to perform the highly specialized search and rescue services we provide. The Forest Service should encourage and reward this service by waiving the fee for an annual pass for all members of PMR and Crag Rats, and also for the members of other units that are accredited by the Mountain Rescue Association, such as Corvallis Mountain Rescue, Volcano Mountain Rescue and Deschutes Mountain Rescue, who are sometimes called up to assist with rescues on Mt. Hood. Thank you for your efforts to improve safety on Mt. Hood. We look forward to working with you on this new permit program and educational efforts.

Comment #135

I regularly recreate/hike/climb within the Mt Hood National Forest. I oppose the proposed climbing fee for the following reasons. I reserve the right to amend this comment in the future.

1. The Forest Service lacks legal authority under the Federal Lands Recreation Enhancement Act (“FLREA”) to impose the climbing fee on Mt. Hood. FLREA Section (d)(1) provides a broad ban on the collection of fees on lands managed by the Forest Service for general access to public land. This ban is consistent with Congress’ intent in establishing the FLREA to deal with maintenance backlog on facilities used by the public entering those areas, but to not otherwise charge the public for general access to public land.

The Forest Service asserts that it has authority under the FLREA provision allowing for a “special recreation permit fee.” FLREA section (h) allows collection of a “special recreation fee “in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use.” Emphasis added.

General access to climb/hike above 9500 ft on Mt Hood does not amount to “specialized recreation uses” as defined by the FLREA. The plain language of the FLREA limits special recreation permit fees to activities “such as group activities, recreation events, motorized recreation vehicle use.” The legislative history of the initial FLREA bill supports the notion that Congress limited the special recreation permit fee to only those three specifically enumerated uses, which clearly do NOT include general access to climb or hike.

Congress proposed the FLREA in 2003 as HR bill 3283. Initially, the “special recreation permit fee” language was much broader. However, during the legislative process, Congress changed the initial language several times, and ultimately decided on the most limiting definition.

HR bill 3283 initially provided:

SEC. 7. SPECIAL RECREATION PERMIT FEE.

(a) Fee Authorized.--The Secretary concerned may require a special recreation permit, and charge a special recreation permit fee, for a recreation use, including any of the following:

- (1) A group activity.
- (2) A commercial tour, including commercial aircraft tour.
- (3) A recreation event.
- (4) Use of a motorized recreation vehicle.
- (5) A competitive event.

- (6) An outfitting and guiding activity.
- (7) An activity requiring an allocation of use.
- (8) An activity for which a permit is required to ensure public safety.

In this initial version, Congress enumerated eight specific uses that constitute “special recreation uses.” As Congress reworked the bill, they changed the language again, eliminating some of the specifically named uses, but added broad language to include potentially many uses:

(h) Special Recreation Permit Fee.-- The Secretary may charge a special recreation permit fee for uses such as group activities, recreation events, motorized recreation vehicle use, and other specialized recreation uses of Federal recreational lands and waters. (emphasis added)

However, by the time that Congress finally enacted the FLREA, which occurred after further discussion and Congressional hearings, they changed the language to its current and most restrictive definition by eliminating the broad catch all language, “and other specialized recreational uses of Federal recreational land and waters.”

Therefore, both the plain meaning of the text and the legislative history of the FLREA indicate that Congress intended the special recreation use permit fee to be issued only in limited instances, specifically, for “group activities, recreation events, motorized recreation vehicle use.” General access to climb or hike are merely general and typical uses of our public land, and clearly do not amount to a group activity, a recreation event or a motorized use. Accordingly, the proposed fee is illegal under the FLREA and the Forest Service should abandon/not impose the climbing fee.

2. The proposed fee for climbing/hiking above 9500 ft will disproportionately negatively affect lower income individuals. Public lands are owned by all citizens and all citizens should be allowed to access them without overly restrictive fees and burdens. Mt Hood is located near the largest population center in Oregon, and draws interest from a large number of people. Adding significant fees will be cost prohibitive to lower income people hoping to access the mountain that is in their backyard. Imposing such fees will ultimately skew access to those people with more expendable income. At this time, we should be finding more ways to be inclusive within the outdoor/climbing/hiking community, instead of adding restrictions/economic burdens. Additionally, adding more public land into the rec.gov reservation/permit system not only continues to enrich private corporation Booz Allen Hamilton, it is also prohibitive to some folks who do not have smartphones, computers or technical savvy.

3. The proposed climbing fee isn't justified. In the online information session, the Forest Service stated that the permit fee was necessary to provide funding for SAR, climbing rangers, and to add a level of safety for those climbing the mountain. While I support funding SAR, it is a volunteer organization separate from the Forest Service that obtains its own funding from donors. Additionally, climbing rangers already exist on Mt Hood and their continued presence is not likely to add a level of safety since they will arrive on the mountain well after climbers attempt their climb of Mt Hood. If safety is the focus and justification for the fee, having folks on the mountain after the fact doesn't increase safety. The Forest Service mentioned sending emails with the permit that would provide information on conditions, etc., on the mountain. Providing this information is a great idea and may help improve safety, but, such information should not cost someone \$20 plus rec.gov processing fees to obtain. In fact, given how easily this information can be disseminated, the Forest Service should be able to provide this information for no cost at all.

4. If the Forest Service moves forward with the fee despite the above issues, it should consider making the permit applicable only for those going above 10,000 ft. Many people train or simply get exercise by hiking up from Timberline to Devils Kitchen and shouldn't have to pay large fees to do so.

For all of those reasons, I oppose the proposed climbing fee and ask that the RAC and/or Forest Service not approve the fee.

Comment #136

RE: Access Fund, High Desert Climbers Alliance and Portland Area Climbing Coalition Comments on the Proposed Mt. Hood Climbing Permit

Access Fund, High Desert Climbers Alliance (HDCA), and Portland Area Climbing Coalition (PACC) appreciate the opportunity to provide comments on the proposed Mt. Hood Climbing Permit. Mt. Hood is a popular mountain to climb due to its accessibility and proximity to larger urban centers like Portland, OR. Climbers have been summiting Mt. Hood for over 100 years. We are eager to work with the Forest Service to find the best possible management strategies to ensure the long-term sustainability of climbing in the area.

About Access Fund

The Access Fund is a national advocacy organization and accredited land trust, that leads and inspires the climbing community toward sustainable access and conservation of the climbing environment. A 501c(3) nonprofit 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 20,000 members and over 123 local affiliates. For more information about the Access Fund, visit www.accessfund.org.

About High Desert Climbers Alliance

The High Desert Climbers Alliance serves the climbing community of Central Oregon through stewardship of its climbing resources and advocacy on their behalf.

Portland Area Climbing Coalition

The Portland Area Climbing Coalition (PACC) is a 501c(3) member-based, nonprofit consisting of local climbers with the goal of land-stewardship and maintaining access to local climbing areas. In addition to trail work and route maintenance, PACC creates and maintains contacts with land owners, works with national level conservation groups, and helps map long-term projects for Portland climbing areas. For more information about PACC, visit www.oregonclimbers.org.

Comments

Mt. Hood National Forest (Forest) is proposing a new climbing permit be required for climbers traveling above 9,500 feet on Mt. Hood. The permit would cost users \$20 and be valid for two days. An annual pass would be available for \$100. Permits would likely be administered through recreation.gov, and be required between April and July of each year. Currently the proposal does not include a limit or quota on permits. The revenue from the proposed new permits would help pay for facility improvements, additional climbing ranger staff, improve climber education, support local search and rescue, and reduce impacts on the natural landscape. Access Fund, HDCA, and PACC have several suggestions for adjustments to the proposal that we request the Forest consider for the long term accessibility and sustainability of Mt. Hood.

Need for Visitor Use Numbers and Cost Benefit Analysis

We support the Forest's efforts to increase staffing from one part time ranger to a full time ranger and two part time rangers. We also support increased efforts to manage human waste issues and increase climber education. However, the current proposal lacks visitor use numbers, it is unclear how many climbers currently climb above 9,500 ft annually on Mt. Hood. Subsequently it is unclear how much money the Forest would make from the new \$20 permit per climber on an annual basis. No data was presented to the public describing budgetary needs from the Forest. A cost benefit analysis

should be conducted to compare the expected revenue from the permits to how much money the Forest actually needs to fund three new climbing ranger positions, support SAR, and pay for upgrades to infrastructure. In addition alternative funding sources should be explored prior to putting all the financial burden on Mt. Hood climbers.

Fees and Equity Considerations and Displacement Study

The proposal of adding a \$20 fee to climb Mt. Hood once or an annual pass of \$100 raises complex equity issues. The Forest has not presented a cost benefit study or explored how these new fees may impact low-income populations' ability to climb Mt. Hood. In addition the new fee could discourage some people from visiting Mt. Hood. A displacement study should be conducted to better understand the correlation between fees and how this might impact and/or displace low-income populations. We understand that fees can be necessary to protect the lands we all love, and that fees are often necessary for the continued management of specific public lands. With that said, if the Forest intends to fully consider the justice, equity, diversity, and inclusion ramifications of the fee increases proposed, the Forest must also have a plan to deal with the negative impacts of the increase on marginalized communities. This does not currently exist.

Furthermore, the proposal suggests the use of an online system ([recreation.gov](https://www.recreation.gov)) to acquire a permit to access Mt. Hood. Additional [recreation.gov](https://www.recreation.gov) fees should be included in the proposed \$20 dollar fee instead of in addition to the permit fee. For example if the [recreation.gov](https://www.recreation.gov) fee is \$8 then the permit itself should cost \$12, the public should not have to pay an additional administrative fee (i.e. \$20 + \$8) due to the Forest using the third party booking site [recreation.gov](https://www.recreation.gov). While the use of [recreation.gov](https://www.recreation.gov) is fairly standard practice across federal land agencies, it can create a barrier for individuals who do not have access to a computer, internet, and a credit card. We suggest the Forest have permits available for the day of purchase with cash/check at the ranger station or self-pay kiosk (i.e. a walk-up option); this is a permit method used at Mt. Shasta. This would provide all sectors of the population fair access to Mt. Hood. We urge the Forest to work with the local community to advance inclusive and equitable access to Mt. Hood.

We support that there will be no quotas or reservations needed for climbers to access Mt. Hood. We encourage the Forest to maintain this decision. If in the future the Forest decides there is a need to limit the number of climbers on Mt. Hood, an additional public process should be held to explore this issue and ensure the public is involved.

Federal Lands Recreation Enhancement Act

During the public meeting Forest staff stated that the proposed permits and fees were legal under the Federal Lands Recreation Enhancement Act (FLREA) under a Special Recreation Permit Fee. FLREA defines a Special Recreation Permit Fee as:

Special Recreation Permit Fee-The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use.

Furthermore FLREA states:

The Secretary shall not charge an entrance fee for Federal recreational lands and waters managed by the Bureau of Land Management, the Bureau of Reclamation, or the Forest Service.

Finally, FLREA states a standard amenity fee can be charged for the following:

Standard amenity recreation fee

Except as limited by subsection (d), the Secretary may charge a standard amenity recreation fee for Federal recreational lands and waters under the jurisdiction of the Bureau of Land Management, the Bureau of Reclamation, or the Forest Service, but only at the following:

- (1) A National Conservation Area.
- (2) A National Volcanic Monument.
- (3) A destination visitor or interpretive center that provides a broad range of interpretive services, programs, and media.
- (4) An area-
 - (A) that provides significant opportunities for outdoor recreation.
 - (B) that has substantial Federal investments.
 - (C) where fees can be efficiently collected; and
 - (D) that contains all of the following amenities:
 - (i) Designated developed parking.
 - (ii) A permanent toilet facility.
 - (iii) A permanent trash receptacle.
 - (iv) Interpretive sign, exhibit, or kiosk.
 - (v) Picnic tables.
 - (vi) Security services.

We request further clarification and justifications be given by the Forest related to how the proposed Mt. Hood climbing permit meets the requirements of FLREA. The activity of individuals or small groups climbing Mt. Hood does not meet the definition of a Special Recreation Permit Fee. Additional improvements would have to be made to justify a standard amenity fee since the permit only applies above 9,500ft where there are no amenities provided such as toilets, trash, signage, picnic tables, ect. We request the Forest provide details on the metrics used to determine the proposed fee amount. In addition, we request a detailed budget on how these fees will be used towards restoration, education and enforcement measures for future management of these Mt. Hood under the new fee structure.

Indirect and Cumulative Impacts

An analysis of the indirect and cumulative impacts should be conducted to assess if adding fees will displace people to other areas in the Forest that do not charge fees. This displacement could cause resource management issues and unintended impacts to other areas with less infrastructure and management.

Permit and Fee Recommendations

Several recommendations were made during the public meeting that our organizations support.

1. We recommend the permit system start as a 1-2 year pilot program to allow the Forest to collect user data and demonstrate that the presence of additional climbing rangers does In fact reduce search and rescue needs and reduce climber impacts to Mt. Hood.
2. We recommend the annual fee amount be reduced \$30-40 dollars a year which is more in line with other nearby volcano and mountain climbs.
3. We recommend the \$20, 2-day fee be re-evaluated at the end of the pilot program and justified or changed based on the amount of income generated by the permits in relation to budgetary needs of the Forest to maintain the climbing program at Mt. Hood. The 2-day permit should be allowed to be used at a different date if weather conditions change and the climber is unable to use their permit on the days they originally purchased it for. This flexibility will ensure that climbers continue to choose their ascent based on good weather windows and not feel pressure to climb because they purchased a permit.
4. The Forest should explore options for the public to obtain a volunteer pass through service hours. The addition of a volunteer pass option to cover permit fees would provide frequent visitors of the Forest an opportunity to provide service for the Forest Service for the season.

5. A full budget should be made available to the public.
6. We encourage the Forest to continue to partner with local climbing and SAR groups as well as our organizations to explore alternative funding mechanisms to contribute to SAR and pay for climbing ranger positions. The entire burden of these costs should not be placed solely on the public.
7. Finally, we recommend permits be required above 10,000 ft rather than 9,500ft. It is common for hikers to go to Devil's kitchen and turn around and not summit Mt. Hood.

Access Fund, HDCA, and PACC Assistance The Access Fund, HDCA, and PACC are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, and other management needs the Forest may require providing for the outstanding opportunities found at Mt. Hood. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain, climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs and providing training on planning and stewardship best practices to keep those areas healthy.

* * *

Thank you for your consideration of these comments on the Forest's proposed Mt. Hood Climber Permits. Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. We look forward to continuing to work with the Forest. Please keep us informed as the planning process proceeds.

<https://www.fs.usda.gov/detail/stnf/home/?cid=stelprdb5353013>

[https://uscode.house.gov/view.xhtml?req=\(title:16%20section:6802%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:16%20section:6802%20edition:prelim))

Comment #138

Portland Area Climbing Coalition Comments on Proposed Mt. Hood Climbing Permit the Portland Area Climbing Coalition appreciates the opportunity to provide comments on the proposed Mt. Hood climbing permit. Mt. Hood is a centerpiece of Oregon climbing and one of the most popular mountains climbing destinations in the United States. We are eager to work with the Forest Service to find the best possible management strategies to ensure the long-term sustainability of climbing in the area.

About the Portland Area Climbing Coalition

The Portland Area Climbing Coalition (PACC) is a 501c(3) member-based, nonprofit consisting of local climbers with the goal of land-stewardship and maintaining access to local climbing areas. In addition to trail work and route maintenance, PACC creates and maintains contacts with land owners, works with national-level conservation groups, and helps map long-term projects for Portland climbing areas. For more information about PACC, visit

www.oregonclimbers.org.

Comments

The Mt. Hood National Forest (MHNH) is proposing a new climbing permit be required for climbers traveling above 9,500 feet on Mt. Hood. The permit would cost users \$20 and be valid for two days. An annual pass would be available for \$100. Permits would likely be administered through recreation.gov, and be required between April and July of each year. Currently the proposal does not include a limit on permits. Information from the MHNH states that the permit fees would help pay for facility improvements, additional climbing ranger staff, improve climber education, support local search and rescue, and reduce impacts on the natural landscape. PACC has significant concerns with the current proposal and several suggestions for improvement that we request the MHNH consider.

Comments Regarding Safety

The MHNH states that “Mt. Hood’s popularity as a climbing destination has resulted in public health and safety issues, including technical search and rescue operations...” and that “The Mt. Hood climbing program needs financial support to help manage and address these issues.” Although Mt. Hood draws many climbers from around Oregon and nearby states, the mountain does not see a disproportionate amount of accidents compared to other popular mountains in the Pacific Northwest relative to the number of climbers that attempt it. Despite its popularity, climbing accidents and fatalities in Oregon remain relatively low compared to California, Washington State, Colorado, or Alaska, even when adjusted per capita. The MHNH has provided no material evidence that climbing-related accidents or fatalities are causing a contemporary public safety issue. Even if climbing accidents were creating a public safety issue, it is unclear how the current proposal from the MHNH would improve safety on Mt. Hood.

During the public meeting held on September 8th, 2022, the MHNH stated that climbing rangers would have little to no certification requirements. The MHNH would benefit from engaging with the National Park Service which deploys climbing rangers at Mt. Rainier. These ranger positions (GS-5 and GS-7) must have full or partial completion of the American Mountain Guides Association Alpine Guide Course; Emergency Medical Technician or Wilderness First Responder certification; and a U.S. Professional Level 1 Avalanche Certification. Until the MHNH proposes similar qualifications for climbing rangers on Mt. Hood, these positions will be of limited utility in both the experience and skills necessary to provide any safety benefit on the mountain. Additionally, the MHNH stated in the public meeting that rangers would never tell climbers to continue with their ascent or to descend, regardless of the conditions.

Understandably, the MHNH does not want to interfere with an individual’s decision-making and the liability of recommending a course of action; however, without the ability to prevent unskilled and unqualified climbers from attempting the mountain, it is unclear what safety improvements would be added.

The MHNH proposes that the fees would improve climber education and thereby safety, but beyond the basic climbing safety information currently provided on the MHNH’s website for climbing Mt. Hood, it is uncertain what additional educational resources would be available. The MHNH has never been, and should not be, an authority on technical mountaineering or climbing safety. This task is better left to organizations like the American Mountain Guides Association and the International Climbing and Mountaineering Federation. In fact, the bulk of the information provided in the safety video on the MHNH’s website is provided by Portland Mountain Rescue, not the MHNH itself.

The MHNH proposes that the permit fees would support search and rescue efforts on Mt. Hood. It is unclear if Portland Mountain Rescue (PMR) or the Cragrats (a Hood River-based rescue team) are in need of resources. Representatives from both organizations did not express this at the public meeting nor have they issued any public comments to that effect. If either PMR or the Cragrats need additional funding or volunteers, allocating a small portion of permit fees to these volunteer groups is an inefficient way of funding their operations. Assuming PMR and the Cragrats are adequately resourced, as they appear to be, interjecting MHNH staff and/or climbing rangers into an already complex search and rescue (SAR) system may actually complicate SAR missions further.

Mt. Hood SAR operations involve both the volunteer rescue teams mentioned above, plus the Clackamas County Sheriff’s Office, Mountain Wave Emergency Communications, American Medical Response’s Reach and Treat Team, the ski patrol at Timberline and Mt. Hood Meadows, as well as the U.S. National Guard. This complex array of actors and agencies continues to provide highly functioning SAR services on Mt. Hood. The MHNH has provided no evidence of how their involvement, particularly with climbing rangers possessing little to no formal certifications, would provide any appreciable benefit. The current system has functioned well, even with the increased climbing traffic on the mountain in recent years. PACC would appreciate seeing data that demonstrates how involvement by the MHNH would provide a demonstrable benefit to the public.

Although the south side climbing routes, namely “The Old Chute” and both left and right variations of “The Pearly Gates” are seeing an increasing number of climbers, the current proposal by the MHNH does not include any quotas or other limitations on numbers of climbers. PACC supports that there will be no quotas or reservations needed for climbers to access Mt. Hood and we encourage the MHNH to maintain this decision. However, with the same number of climbers as prior years; climbing rangers without accredited certifications nor the ability to dissuade climbers that are unprepared from continuing their summit attempt; and no apparent benefit to SAR operations, it is unclear what the meaningful improvements to public health and safety can be expected.

Comments Regarding Cost

The MHNH is proposing a 2-day permit fee of \$20 or an annual permit for \$100. When questioned about the basis of the fee during the public meeting, the MHNH responded that “part of the reason we’ve proposed \$100 is to kind of see what public reaction is to that”.⁵ The lack of rationale or data provided by the MHNH in making this determination is completely unacceptable. The MHNH should provide a draft budget for the proposed program expansion, along with the expected number of climbers and skiers who might purchase the permit. The annual climbing permit for Mt. Shasta is \$30.⁶ The annual climbing fee for Mt. Rainier is \$53 for adults.⁷ The climbing-related infrastructure and services provided at Mt. Rainier are substantially more beneficial than those proposed at Mt. Hood. Additionally, the services provided at Mt. Rainier are not heavily augmented like those at Mt. Hood, where three ski resorts not only generate revenue for the MHNH through their leases and land use agreements, but also maintain snow plow operations which provide parking and trailhead access for climbers throughout the winter and the spring.

The notion that a significantly higher permit fee for climbing Mt. Hood is justified by proximity to a large population center like the Portland Metro Area, may unintentionally limit climbers by imposing a financial barrier. PACC strongly recommends that the MHNH reconsider this fee and propose a fee based on actual use numbers, services provided, and relative cost to other nearby volcanoes. The fact that Mt. Hood sees significantly more climbers than Mt. Shasta or Mt. Rainier, and thereby would provide an even larger revenue stream, should lead to a lower overall fee than less popular mountains. Additionally, the MHNH should fully consider the justice, equity, diversity, and inclusion ramifications of such a high fee and the negative impacts on marginalized communities. This financial barrier is in direct conflict with the U.S. Department of Agriculture and the MHNH Service’s own initiatives regarding expanding access to the outdoors for underserved and minority communities and young people from urban areas.⁸

Permit Recommendations

If the MHNH continues with the implementation of a climbing permit program at Mt. Hood, PACC has several recommendations. We recommend that the permit system start as a 2-4 year pilot program to allow the MHNH to collect user data and demonstrate that the presence of additional climbing rangers or disbursement of additional safety information does in fact improve public safety, reduce search and rescue needs, and reduce climber impacts to Mt. Hood. The burden of proof lies with the MHNH to demonstrate that the benefits provided to the public are commensurate with the fees charged. We recommend no single climb fee, and simply an annual fee closer to the \$10-\$20 range. The annual permit flexibility will ensure that climbers continue to choose their ascent based on good weather windows and not feel pressure to climb because they purchased a permit for a certain date. We recommend any fees be re-evaluated at the end of the pilot program and justified or changed based on the amount of income generated by the permits in relation to budgetary needs of the MHNH to maintain the climbing program at Mt. Hood. The MHNH should explore options for the public to obtain a volunteer pass through service hours. The addition of a volunteer pass option to cover permit fees would provide frequent visitors of the MHNH an opportunity to help protect and preserve Mt. Hood.

With the highest concentration of climbers on the south side climbing routes, we recommend the pilot program be

focused on the south side climbing areas only. PACC understands the concern that high fees may persuade climbers to explore other, more difficult aspects of the mountain if only the south side of the mountain is permitted, but no data has been provided to support this claim. The MHNH should demonstrate this is actually the case before implementing a mountain-wide permit system. With the greatest concentration of climbers on the south side of the mountain, and assuming climbing rangers will be focused on the areas with the greatest number of people, a permit for the west, north and east aspects of the mountain is a fee with essentially no services provided.

Finally, we recommend permits only be required above 10,000 ft rather than 9,500ft. It is common for climbers and skiers to go to the Devil's Kitchen area as a conditioning climb or for the ski descents offered from that location.

PACC Assistance

Thus far, the majority of local climbing community feedback on the MHNH's proposed permit system has been negative. Likewise, PACC has significant concerns with the current proposal but is ready, willing, and able to help the MHNH shape any proposed permit programs so they provide a benefit to the climbing community. PACC works closely with the Access Fund, a national climbing advocacy organization, who also stands ready to assist the MHNH. Thank you for your consideration of these comments on the MHNH's proposed Mt. Hood climbing permit. PACC looks forward to continuing to work with the MHNH on this issue. Please keep us informed as the planning process proceeds.

Mt. Hood National Forest, September 8th, 2022 public meeting recording, timestamp 46:45.

<https://fb.watch/fQAddQmXOv/>

Mt. Hood National Forest, September 8th, 2022 public meeting recording, timestamp 1:01:47.

<https://fb.watch/fQAddQmXOv/>

<https://sites.google.com/stephabegg.com/photography/projects/2/accidentstats> with data sourced from

<https://github.com/ecaroom/climbing-accidents> with data sourced from Accidents in North American

Climbing publications, 30-year study period 1990 to 2019.

<https://www.nps.gov/mora/planyourvisit/climbing.htm>

<https://www.fs.usda.gov/detail/stnf/home/?cid=stelprdb535301> 3

Mt. Hood National Forest, September 8th, 2022, public meeting recording, timestamp 42:20.

<https://fb.watch/fQAddQmXOv/>

<https://www.fs.usda.gov/speeches/diversity-and-inclusiveness-forest-service>

Comment #145

Use of Recreation.gov for permits Recreation.gov is an absolute scourge and leech of the public commons. The public should never be paying a private for-profit company a per-transaction fee, with non-refundable costs, for legal access to public lands. Operated by Booz Allen Hamilton, and owned by an equity firm The Carlyle Group, there is minimal incentive for satisfactory public experience as there is limited competition to take on such a large government contract. Booz Allen Hamilton was already paid \$182 million of tax payer money to operate recreation.gov for 10 years. That they are able to capture additional fees on every transaction for public access to public land is deplorable and in direct opposition to the ethos of public lands. Recreation.gov harvests all the rewards with minimal risk and holds no responsibility in the upkeep and maintenance of public lands.

Use of SRS RACs One great concern is that the FS has provided no rationale for why a Pacific Northwest Regional Resource Advisory Committee has not been formed in what appears to be 12 years¹, the last meeting notes shown online appearing from 2/2/2010.

Fee Authority for FLREA2 derives from §6802(B)(5) "The Secretary shall obtain input from the appropriate Recreation

Resource Advisory Committee, as provided in section 6803(d) of this title.” It is only under 6803(d) that an alternative Resource Advisory Committee is permitted to be used. “In lieu of establishing a Recreation Resource Advisory Committee under subparagraph (A), the Secretary may use a Resource Advisory Committee established pursuant to another provision of law and in accordance with that law or a recreation fee advisory board otherwise established by the Secretary to perform the duties specified in paragraph (2).

This largely by-passes many of the requirements in 6803 regarding the composition of membership representing the public for changes based on recreation decisions. Secure Rural Schools RAC’s Objective and Purpose are as follows: “The purpose of each RAC is to improve collaborative relationships among the people that use and care for the National Forests and to provide advice and recommendations to the Forest Service concerning projects and funding consistent with Title II of the Act.”

Title II of SRS is for projects on Federal Lands. Recreation site fee changes and climbing permits are not Title II projects. It is convenient that the SRS charter has shoehorned that the DFA (Designated Federal Officer) may request the SRS RAC take on recommendations “in addition to regular SRS duties”³, including offering input on the implementation, elimination, or expansion of standard amenity, expanded amenity, and special recreation fees and sites.

This language would imply that having an SRS board provide these recommendations based on fee terminology from FLREA is irregular, if it is outside of their regular SRS RAC duties. This is highlighted by the fact that SRS RAC seats must be held by members from the specific state the SRS RAC serves. In a case of the Hood-Willamette SRS RAC, Southwest Washington’s metro areas in close or even closer proximity than Oregonians have no input on financial decisions affecting recreation, even though Mt. Hood National Forest may be their primary area of recreation and in as reasonable proximity as the Gifford Pinchot National Forest. This same fault of using SRS RACs also excludes Oregonian’s participation from the GPNF SRS RAC.

The continued use of SRS RACs in lieu of forming a Pacific Northwest Regional Recreational RAC is antithesis of FLREA’s intent and the Forest Service has had 12 years to provide the public with a rationale and explanation for why a Recreational RAC does not exist, and does not seem to have a readily available answer.

From the Hood-Willamette SRS RAC As a recreationalist of the Mt. Hood National Forest, I really wonder what bearing having two equestrians, a retired lumber broker, Marion and Linn County Commissioner, and two grazing permit holder or other private Forest Land use persons have on determining fee recommendations on a climbing permit.

The county commissioners do not even live in any of the counties in which Mt. Hood is in, assuming they must live in the county they represent. It is a real bastardization of FLREA, Recreation RAC, and SRS RACs to have these people providing recommendations to the regional Forester. These people are not representative of recreational uses, but instead reflect the composition of a Title II SRS RAC.

Mount Hood Climbing Permit

As a private citizen only representing myself, I am ashamed at the absolutely half-baked proposal regarding Mt. Hood permits. It is hard to imagine this reflects the best efforts of a public agency responsible for the stewardship of public lands. The personnel involved in this roll-out should be barred from further public facing communications or proposal development. If this was a private citizen presenting a business plan, they would be laughed out of every bank and board due to a total dearth of supporting market research.

The Mt. Hood Climbing permit related communications detail the following:

☐ Proposed fee prices are based on a market analysis of similar sorts of opportunities within Oregon and Washington.

- ☒ Climbing permit fees will be used to provide daily patrol along the climbing route, improve climber education, support search and rescue, and reduce human impacts on the natural landscape.
- ☒ The two-day climbing permit will only affect climbers above 9,500 ft., which is well above the ski areas and the Timberline Trail.
- ☒ The current climbing permit proposal does not include a limit on permits issued.

Why do we need a climbing permit?

- Mt. Hood's popularity as a climbing destination has resulted in public health and safety issues, including increased technical search and rescue operations, human waste in sensitive ecosystems, and parking issues at trailheads. The Mt. Hood climbing program needs financial support to help manage and address these issues.
- Among other improvements, permit fees will be used to provide patrol along popular climbing routes, improve climber education, support existing search and rescue organizations, and reduce human impacts on the natural landscape

It is clear that the Mt. Hood Climbing Permit has not conducted market analysis of similar opportunities within Washington and Oregon. I can find no evidence of any fee over \$53 for an annual climbing permit in either state. There is no evidence of any other climbing permit in the state of Oregon. Numerous volcanoes are free to climb, and a limited number in Central Oregon require a \$5 special recreation permit for day access during the summer season, as do numerous trailheads for hiking. There are no specific climbing permits on federal lands in Oregon. In Washington only 3 out of an array of peaks require a climbing permit. Of those, only one has an annual pass at \$53 (Mt. Rainier). Both Mt. St. Helens (\$22 day use) and Mt. Adams \$15 3 day weekend pass/\$10 3 day weekday pass also have limited pass seasons.

\$53 for an annual Mount Rainier climbing permit in MRNP comes with a team of accredited and certified climbing rangers, high mountain operation points with waste management facilities (Camp Muir, Camp Schurman), and a robust public outreach that provides regularly updated information about climb routes across the whole mountain, and enforcement activity. Aside from funding two climbing rangers, the best 'material' support that MHNH can offer for the \$100 yearly and \$20 annual fee is the offering of blue bags. This is unacceptable. If this is the material needed, perhaps MHNH could first attempt to gain a donation or sponsor for the blue bag materials. Has MHNH even solicited local groups for assistance in this endeavor? I have not heard of such outreach. \$100 for an annual permit is entirely unrealistic and there has been no rational basis provided for this. It is not equitable and comes on top of a NW Forest Pass and/or SnoPark Pass cost. A snowpark pass pays for parking lots to be plowed, plow operators, parking lot maintenance. What as a climber getting for \$100? What does an experienced climber who climbs the mountain multiple times a year via multiple routes 'get' for \$100? What are the services or materials? MHNH has not demonstrated anything tangible in this regard.

Secondly, suggesting fees will provide daily patrol (what will this achieve?), improve climber education (is there a metric or any other case where a permit fee has demonstrably improved climber education?), support search and rescue (how? In what capacity? Is this at S&R team's request or solicitation?), and impacts on the natural landscape (is there a baseline of environmental impact upon which the implementation of a fee can thus be measured against? To demonstrate the permit fee will reduce human impacts on the natural landscape. MHNH spokesperson Heather Ibsen has said there is a recent increase in search and rescue operations on the mountain. No statistical information has been provided to back this up. Nor has any statistical information been provided to demonstrate a permit and a ranger will reduce S&R operations. There are permits and rangers on Mt. St. Helens and Mt. Adams and yet rescues still regularly occur on both of these mountains.

In addition, it is of questionable merit to highlight human impacts (non-mechanized) on the natural landscape when there are multiple ski resorts on the mountain, one that coincides with the primary South climb route. Has the Forest Service considered the impact of Snow-cat and lift operation, diesel exhaust, light and sound pollution, all of which affect adjacent wilderness areas? Not to mention the annual salting of Palmer Snowfield, coming in under 'EPA guidelines' is a bare minimum. Should we actually be introducing salt into the environment for recreational enhancement? The ski area

impacts are concrete and demonstrable. There has been no evidence provided that human impact on the higher mountain has increased or is getting worse. In addition, the climber's bivvy bathroom has been locked for what seems like years at a time, through the entire winter climbing season. It is peculiar that MHNH would not make this available to climbers if they are concerned about waste on the mountain. Perhaps they should have a mid-mountain waste facility like Camp Muir, up at Silcox Hut or the top of Palmer. They wouldn't even have to use a helicopter to remove waste like in MRNP.

MHNH claims a climbing fee will address parking issues at trailheads. But MHNH fails to elaborate what trailheads (plural) are affected by climbers and why parking, managed by ODOT and SnoPark funds in winter, need a special recreation permit to resolve. MHNH has provided no evidence of any specific issues. This seems like a statement originating from RLK and Co., operators of Timberline lodge and ski area, expressing frustration that the public wants to access public lands outside of their monetization. In my decade+ of experience climbing Mt. Hood, I have never once found a parking issue when beginning a climb before ski operations commence at Timberline or Cooper Spur Snow Parks.

Regarding the elevation of the permit, myself and my peers regularly take trips to the Hogsback or just below for skiing or training objectives. This is before any technical climbing area and is a regular day-trip. I would suggest any permit creation should be for 10,000 or even 10,500 feet if it is intended to address the 'safety' concerns that patrols allude to. There's been no explanation provided for how rangers would increase safety. "Mount Hood National Forest spokeswoman Heather Ibsen said. "This is really just for the technical climb to the summit."6 – thus MHNH even concludes it is only for the technical climb, not areas below it. Professional and Club Mountaineering organizations would not deem the access terrain below the Hogsback as technical. "When choosing the elevation, generally, we wanted to make sure that it stayed above the ski areas, above the Timberline trail," explained Heather Ibsen, public affairs officer for the Mt. Hood National Forest. "Zeroing in, really, on people hoping to do that more technical climb."7 Once again, there is nothing more technical going to Illumination Saddle than there is going to Devil's Kitchen on Mt. Hood. So why is the elevation 9,500? It's too low.

Finally, the statement that the current permit system does not include a limit on permits issued is entirely disingenuous. Per an interview with the Statesman Journal, Heather Ibsen is quoted as saying "This will get us much better numbers on how many people are climbing on a busy weekend, for example, or how many people are climbing the busiest routes," Ibsen said. "Right now we really only have anecdotal information on numbers but we do know it's impacting the wilderness and parking. Ibsen declined to say whether the number of permits would be limited in the future, as a tool to limit crowding, which has occurred in a number of places across Oregon and the West. But it would give the agency the numbers to make that case in the future.

"That conversation is probably down the road but there won't be any limit in 2023," Ibsen said."6 It is completely unacceptable to charge the public access to public lands as a means to simply determine how many people are accessing the mountain. For all MHNH may know, they still won't have clear numbers because people will skip buying a permit, just as they skip filling out the self-issue climbing forms. Which as a climber I can say there have been multiple times that the kiosk is empty of permits. Perhaps MHNH should do a better job keeping those self-issue permits stocked if they wish to know better numbers.

To that end, I am totally and wholly against limited number permits on public lands and their administration via recreation.gov. Limited permits creates artificial demand, is inequitable in their access, on top of the cost, and leads to hoarding and decision making contrary to safety or experience. Again the impact on parking is mentioned. If MHNH is going to mention the impact on parking, they should detail the specific issues. I have not ever heard of a Special Recreation Permit existing to address parking concerns and the FS should not attempt to use FLREA and Special Recreation Permits to address parking, and parking is not a form of recreation. People also take public transit and carpool to the mountain. And MHNH does not provide the equipment of funding for the maintenance and plowing of parking lots.

Mount Hood National Forest Fee Changes Mt. Hood National Forest, like most other National Forests, has a large and ever growing deferred maintenance budget. This demonstrates that the existing fees do not pay for the sustainable maintenance of recreational facilities. FLREA, as an extension of the Northwest Fee Demonstration, was ever intended to self-support funding for recreational sites and activities. It was intended as a supplemental revenue source such that a user who visits a site and pays the fee, could expect it to be in better condition on a subsequent visit. Funds are intended to be a supplement to existing appropriations. The response to falling appropriations and revenue from resource extraction is not to raise fees on the public, as this continues a downward spiral of pay-to-play and inequitable access that will ultimately undermine public support for the National Forest and increase the likelihood of private capital involvement and concessionaires.

I am categorically opposed to adding any fee to a location where any capital expenditure must be made to make the site compliant with FLREA Standard or Expanded Amenity fee requirements. This is good money after bad, as it will only contribute to the on-going deferred maintenance budget to build new facilities or provide on-going maintenance, garbage collection, etc.

Barlow Ranger District proposes charging fees at 14 new locations where there was none before.

- Keep's Mill – Is this even accessible? MHNH lists it as closed. Will facilities be put in to make this compliant with an expanded amenity recreation fee? It is not even accessible by passenger car. Hood River Ranger District proposes charging fees at 3 new locations where there was none before. Clackamas Ranger District proposes charging fees at 4 new locations where there was none before. Zigzag Ranger District proposes charging fees at 1 new location where there was none before.
- Lolo Pass. Will a permanent toilet be installed here?

As part of maintaining equitable access, preventing the monetization, privatized profits from public recreation, it is immensely important to maintain all no-fee campgrounds for the public.

Security Services

The Mt. Hood National Forest website mentioned previously also states: "Visitors to areas where the Forest is charging a fee will see increased visitor security,"⁴ This implies visitors currently see security services. Numerous Mt. Hood National Forests are subject to repeated break-in activity. Be it Ramona Falls, Salmon River, or Elk Meadows/Umbrella Falls trailheads, to mention a few common areas. The text above implies there is a modicum of security services provided by the National Forest and not local law enforcement. The FS has never provided any baseline metric of security services provided, nor any standards or metrics by which they intend to demonstrate increased fees have improved security.

It is a tenuous path to even mention visitor security, given it is one of the enumerated items required under a standard amenity fee in FLREA2. Yet by evidence of numerous break-ins over years and year, this amenity does not seem provided in any measurable way. This seems to open the FS to legal liability for not providing a service that is specifically enumerated for every standard amenity fee site, but unfortunately not defined in detail enough in FLREA to determine.

Accounting not provided of funds collected and spent The Forest Service at large, including Mt. Hood National Forest regularly tout that money is retained for expenditure at the site collected. As of present, MHNH no longer appears to have a section on their website that generically explains where FLREA generated funds are used. The I have seen a breakdown by National Forests of funds collected and spent, but it is so generic as to be vaguely informative about where money actually goes.

Never have I been able to find an accounting on a per-site basis where funds have been spent. In the case of 5 Mile Butte

Lookout, as with other lookouts that maintain a near 100% booking rate, the gross revenue for the booking season is \$18,250 (365 days x \$50/night). Over the prior decade this is \$182,500. It is accepted that not every night for the prior 10 years is booked. But even at a 75% booking this is \$136,875 gross revenue generated from the site. Can MHNH provide the line item expenditures for this site (including propane, maintenance of lookout itself, outhouse, woodshed, access gate, and road to lookout?).

I have stayed in many lookouts across Washington, Oregon, and California and exempting those officially staffed on a seasonal basis for firewatch duties, most are in need of significant maintenance and are regularly improved by volunteers. Even items as menial as functional brooms, unperforated screens in windows, chairs, and cots are often in disrepair. It is laughable as these items do not cost thousands of dollars and are easily transported in a FS truck.

This same line of observation is clear at trailheads where simple items like a new picnic table go years between replacement, the state of bathrooms is unacceptable, overflowing trash cans lead to more litter on the ground, and informational kiosks get vandalized or damaged by tree-fall. Why does the FS want to commit to the forever outlay of on-going maintenance and upkeep of new such facilities at sites where these 'amenities' previously did not exist? This is a misguided endeavor Where would the public find actual revenue numbers based on each site's collection, and expenditures on a per-site basis? Without this information I cannot support raising existing fees on lookouts and Campgrounds.

Legal grounds for collecting standard amenity fees for users who do not use amenities The United States District Court, District of Oregon, Portland Division moved to dismiss a ticket given on the basis of requiring a fee at trailhead for someone backpacking.⁸ Citing Adams v. U.S. Forest Service whereby Judge Gettleman specifies the FS may not charge solely for parking and hiking, as this is unambiguously prohibited.

It seems the MHNH has avoided litigation on this topic as they hand out 'warnings' that appear as citations and allude to the possibility of being cited for violating the law. MHNH should state a clear position on the validity of the NW Forest Pass and if it is required solely for parking and hiking without using the other amenities enumerated in FLREA.

https://www.fs.usda.gov/detail/r6/recreation/racs/?cid=fsbdev2_026883

<https://uscode.house.gov/view.xhtml?path=/prelim@title16/chapter87&edition=prelim>

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd676706.pdf

<https://www.fs.usda.gov/detail/mthood/recreation/?cid=FSEPRD1042889>

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<https://statesmanjournal.com/story/news/2022/06/10/new-permit-likely-required-to-summit-mounthood-beginning-in-2023/65359879007>

<https://koin.com/news/oregon/mt-hood-forest-proposes-new-fees-for-climbing-hiking-camping/>

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[uploads/2015/10/US v Fairbank Govt Request to Dismiss1.pdf](https://www.westernslopenofee.org/wpcontent/uploads/2015/10/US v Fairbank Govt Request to Dismiss1.pdf)

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Comment #151

Comments on recreation fee proposals - September 2022 Overall I support expanding the number of trailheads or day use sites that required a Northwest Forest Pass or honors the America the Beautiful Passes. I also support fees for developed Campgrounds.

The areas that I have concerns with are as follows:

Day use/Trailhead Fees: The recreation site that that has the most amenities, Timberline Lodge, is not included in the day use fee. I feel that it should be during the non-snopark season. Like with the Oregon Snopark Permits, RLK and Co can designate an area for their overnight guests, dining room guests and employees to park what would not require the Northwest Forest Pass. I will speak more about this in my climbing permit response below.

Lookout rental pricing: Lookout rental program is great but an \$85/night fee hits that level to price some less economically advantaged folks out of the option. Adding the recreation.gov fee of \$8 or more puts that really at \$93. Sure the market demand could support that but that is not what should drive fees on public land - otherwise you could start asking that for campground sites also.

Climbing fee: Here is what your web site says

The special use permit and fee will be required for all climbers going above 9,500 feet in elevation on Mt. Hood. The Forest Service maintains a climber registration at Timberline Lodge and also provides climbing ranger patrols of the area to increase visitor education and awareness around safety and natural resource protection. The proposed fee would allow the Forest Service to support our partners involves with search and rescue efforts, provide each permitted climber with a waste disposal bag to reduce backcountry impacts from improper waste disposal, and regularly patrol popular climbing routes during the primary climbing season. Amenities. Paved and unpaved parking areas, signage, climber registration, WAG bags, climbing ranger patrols, maintenance of climbing routes and associated trailheads.

I do not support the climbing fee for the following reasons: The \$20 fee per person would make climbing the highest permit fee on the forest. On the spectrum of recreation users on the forest, climbers are on the low end of needing services and amenities from the USFS. Why is their fee proposed to be so much higher than river runners, mt bikers, or OHV riders, let alone the dispersed campers who pay nothing but make huge resource impacts?

Considering the resources that the USFS needs to commit to other activities on the Mt Hood NF, the climbing program pales. Investments in government owned facilities at Timberline typically take a huge share of the capital investment funds that the forest gets. The forest needs to spend more on dispersed camping issues and consider a fee for that use.

The visitors parking at Timberline Lodge do not pay a recreation fee outside of the winter snopark permit which goes to the state. The USFS has invested 10's of millions of taxpayer dollars into the historic lodge, day lodge, parking lots, and related facilities. In addition, USFS has provided free interpretive programs. Again, there is no fee for these visitors.

Yes, RLK pays a fee each year which helps offset a portion of that. What does that fee truly amount to per person when you look at the number of visitors who park at the site? The Mt Hood NF states that there are approximately 2 million visitors a year to Timberline. Look up what RLK & Co pays each year and divide that by 2,000,000. Is that anywhere close to the \$20/person that you are proposing for a climber's permit? Drop the climb fee and make the Timberline parking lots a USFS day use fee site during non-snopark months and have an area - like the upper parking lot and "chute" for hotel guest and employees where a fee would not be required.

The following are thought son what the USFS says the funding would be used for:

- WAG bags. Change the blue bag program into a WAG bag program? How would this protect Hood? The components of a WAG bag packet: hand wipe packet, TP packet, a huge plastic bag that could line a 5-gallon bucket, poo powder to gel the waste, a zip lock bag. Cost for 10,000 would be about \$20,000. In a Blue Bag system - there is small plastic blue bag (like a dog waste bag and used the same way) and a thicker small plastic bag and a twist tie. Cost for 10,000 is estimated to be under \$1,000. So with a blue bag, you poop on the ground and then pick it up with the blue bag and put the blue bag in

the thicker bag and twist tie. With a WAG bag, it is designed to be pooped into so how does this work with mountain wind blowing the bag? I use WAG bags - but not in a high alpine environment. How would this improve the program overall? How would these more costly WAG bags be distributed since you can't just have a pile of them in the climber's register?

- Toilet in the climber's register? For years the toilet supposedly could not function in the cold weather so was closed and locked in the winter. If it is consistently functional, will it be open year-round? Do you think that climbers are going to really be the primary user of the toilet given that the day lodge is locked up each evening when it is the only toilet available?

How much of the \$20 fee should go to having a functioning toilet? What does everyone do when it is locked up now? Is it really needed?

- Staffing? So, the primary climbing season is April to early July. Some USFS presence is needed but how much? Is the current staffing proven to be inadequate? Why has the funding from the Mazamas stopped? After the west crater rim fatality involving a Mazama group, the Mazama's offered funds to help expand the staffing for the climb route to provide more frequent condition reports.

- Climbing route maintenance: Really for the climb route? What route maintenance? There is no need to maintain the route - other than RLK and Co putting in the cat track to keep climbers off the Palmer. Are you thinking of putting wands up?

- Visitor education: How would this be different than what is currently being done? PMR had plans to try and get grants to remodel the climb register and focus on education. What happened to that?

- Support climb partners who provide search and rescue: This makes the most sense of everything proposed. I have been told by USFS that it would most likely go to the two county sheriffs via some yet to determined agreement. So why not do an agreement with PMR and Crag Rats and Mt Wave to support them? What would be the outcome of any support to partners?

Potentially good but unintentional outcome of climb fee: Fewer "off the cuff" folks up high on the mountain. By this I mean folks without climbing skills or without appropriate gear deciding to go high on the mountain.

Finally - There is such inconsistencies with how the USFS manages the high volcanic peaks in the PNW. Until recently, the only volcano with capacity limits was St Helens which is the only non-wilderness volcano and is a day hike. How much sense is that? Now the Three Sisters are the only wilderness climbs with capacity limits. I recommend taking a hard look at how all the volcanic alpine climbs in Oregon and Washington are managed to provide some perspective to support long range planning.

Appendix B:

Special Recreation Permit Fee Management Plan

Mt. Hood Climbing Program

Mt. Hood National Forest

Introduction

The Forest Service is proposing a Special Recreation Permit fee for visitors climbing above 9,500 feet in elevation on Mt. Hood within the Mt. Hood National Forest and the Mount Hood Wilderness. The Federal Lands Recreation Enhancement Act (FLREA) authorizes a Special Recreation Permit (SRP) and SRP fee for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, and motorized recreational vehicle use [16 U.S.C. 6802(h)]; as well as specialized sites such as shooting ranges. Special Recreation Permits are issued as a means of ensuring the protection of natural and cultural resources, providing for the health and safety of visitors, providing visitor services, and helping cover the higher costs of providing these specialized recreation opportunities.

Under the Mt. Hood Climbing Program SRP plan, an SRP and associated SRP fee would be required for all use on Mt. Hood above 9,500 feet in elevation. The SRP fee component of the plan includes two summit permit options, a two-day permit, and an annual permit. The two-day permit provides access above 9,500 feet for a 48-hour period specified at the time of purchase and is expected to be the more common permit purchased by visitors. The annual permit provides unlimited access above 9,500 feet and is expected to be more commonly purchased by locals who may backcountry ski/snowboard or climb Mt. Hood multiple times during the year.

No fee is currently charged under the authority provided by the FLREA for this specialized recreational activity. The establishment of a climbing fee is needed to provide adequate funding for the Forest Service to sustainably manage the Mt. Hood Climbing Program. This funding is necessary to provide adequate staffing for specialized climbing patrols and for resource protection within the Mount Hood Wilderness. Funding is also needed for climber safety information and education, health and sanitary condition improvements, infrastructure maintenance and improvements, and to support search and rescue (SAR) groups that have long been dedicated to emergency response on Mt. Hood.

This Special Recreation Permit Fee Management Plan outlines the rationale for the SRP, how the SRP revenue will be used to support the specialized recreation experience managed under the Mt. Hood Climbing Program, and the requirements of the SRP.

Background Information

Mt. Hood provides a scenic backdrop to the Portland metro area and is popular with local, regional, national, and international visitors. The iconic landscape of the Mt. Hood National Forest attracts over two million visitors annually. The Forest Service has the responsibility of ensuring the area is managed to protect resources while still providing recreation opportunities.

Visitor use monitoring data show that the Mt. Hood National Forest experienced a 40 percent increase in visitation from 2006 to 2016. Data collected in 2021 indicate a continued increase in visitation across the Forest. Forest Service personnel, SAR groups, and outfitter/guides who operate on Mt. Hood have similarly seen the number of visitors climbing the mountain increase significantly in recent years.



Estimates indicate over 10,000 climbers attempt to climb Mt. Hood each year. Much of this use occurs during the peak climbing season of April through July. The south side climbing routes, including the Pearly Gates and Old Chute variations, are the most popular and are considered the easiest routes to the summit. Other routes accessible from National Forest System trailheads on the eastern and northern sides of the mountain are also used to access Mt. Hood's summit and upper elevations. As the number of climbers has increased, the number of injuries and fatalities have also increased. Since climbing Mt. Hood became popular in the early 1900's, there have been over 135 climbing fatalities on the cascade volcano. Rescues led by local Sherriff's offices, with assistance from volunteer SAR organizations, have increased as well. Clackamas County Sherriff's Office averages eight high-elevation rescues on Mt. Hood each year. Hood River Sherriff's Office has responded to 28 high elevation SAR incidents over the past nine years, with a majority of those incidents occurring in the last three years. Between 2013 and 2017, 31 percent of the calls that Portland Mountain Rescue (PMR) responded to were for climbers on the upper elevations of Mt. Hood.

Recreational use has negatively impacted both natural resources and visitor experiences in the area. The area covered under the proposed SRP program is located completely within the Mount Hood Wilderness. Maintaining the wilderness character of the area is a legal requirement. Public health and safety issues result from the improper disposal of human waste. The SRP fee is needed to sustainably manage recreation use in the alpine upper elevations of Mt. Hood.

Existing Climbing Program Management and Challenges

Program Staffing

The Mt. Hood National Forest has one non-permanent, seasonal climbing ranger that patrols the area and interacts with climbers. This level of staffing allows only minimal coverage of popular climbing routes during peak climbing season. The lack of a second ranger is a safety concern and greatly limits the sole ranger's ability to cover the routes, make adequate climber contacts, and accomplish effective maintenance, monitoring, and enforcement work. Due to the technical skills and training required of a climbing ranger, it is not feasible for staff of other programs to help cover climbing ranger duties.

Public Safety

Climbers must possess alpine mountaineering skills to ascend and descend all routes accessing the summit of Mt. Hood. It is not uncommon, though, for visitors with little to no mountaineering experience to attempt to climb and summit Mt. Hood. Visitors come from around the world to attempt summit climbs. The ease of access to the mountain base via a state highway and the high levels of use on climbing routes often result in accidents requiring rescue. To support SAR personnel and volunteers, the Forest Service maintains a voluntary climbing register. Climbers are encouraged to sign in at the register with their name and information. This has helped provide baseline information for SAR efforts. The climber registration area is located within the Wy'East Day Lodge at the Timberline ski area. Climbing registration, and the required wilderness

permit, are currently free for users. The wilderness permit is required from May 15 through October 15. With only one ranger on staff, the amount of time that can be spent on upkeep of the climber registration area is severely limited. The Forest Service partners with Timberline Ski Resort to maintain the climber registration area.

Facility Limitations

The parking area used by climbers to access the most frequented climbing routes is located within the Timberline ski area parking lots. Parking in this location is limited and increasing parking capacity requires significant planning efforts. A site plan is needed to provide more adequate parking and improve configuration of the climber registration area and trailhead. Additionally, the current climber registration area badly needs improvements and lacks a toilet facility that can be open year-round, 24 hours a day. These infrastructure needs are currently unfunded.



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Waste Removal Program- WAG Bags

Human waste pack-out programs prevent negative impacts to natural resources, wildlife, and visitor experiences resulting from improper disposal of human waste. Currently, the Forest Service provides “Blue Bag” human waste pack out bags, which are like dog waste bags. The “Blue Bag” system is inexpensive to purchase; however, it requires significant assembly time by Forest Service personnel and the single use, fragile plastic bags are generally disliked by climbers. Waste Alleviation and Gelling (WAG) bags, preferred by climbers for their robust nature and multiple use capacity, should be provided for all permit holders to maximize the program’s effectiveness and eliminate the significant workload of blue bag assembly. The climbing program lacks sufficient funding to provide WAG bags for all climbers.



Volunteers and Partnerships

The current climbing program lacks sufficient Forest Service staffing capacity to coordinate, recruit, educate, and retain volunteers and build partnerships that could thrive and contribute to work of the program. Current partnerships include Portland Mountain Rescue and the Hood River Crag Rats, crucial partners assisting search and rescue efforts led by local Sherriff’s offices. Partnership support from the Forest Service is limited; the Forest Service provides radio batteries and some other minor equipment and supplies. No additional funding to support partnership programs is available from the Forest Service under the current budget.

Item	Annual Cost (FY22)	Item Description
Personnel		
Climbing Ranger GS-6, Forest Protection Officer – 120 days	\$23,400	Full time (temporary) seasonal climbing ranger, providing information and patrolling climbing routes for resource protection.
Visitor Services Support	\$10,000	Climber education at district offices, climber registration area, and online.
Total Personnel Costs	\$33,400	
Fleet (Vehicles)		
Seasonal Fleet	\$2,500	Transportation for seasonal Climbing Ranger
Total Fleet Costs	\$2,500	
Other Costs		
Blue Bag Program	\$4,000	Provided to reduce improper disposal of waste
Materials and Supplies	\$3,000	Safety and climbing equipment, uniform, signage, and associated supplies
Training	\$2,000	Forest protection officer, mountaineering, avalanche, and emergency medical training.
Total Other Costs	\$9,000	
Total Program Cost	\$44,900	

Climbing Program Budget

The following table provides the current Mt. Hood Climbing Program’s costs per year, which come directly from the annual allocation of funding provided for delivery of the Forest’s developed recreation, wilderness, and trails programs.

Table 1. Current climbing program and costs (FY22)

Rationale for the Special Recreation Permit

Special Recreation Permit Need

The Mt. Hood climbing program currently provides specialized services that qualify as acceptable uses of SRP revenue as outlined in FSH 2309.13 CH 32.4. The forest intends to utilize SRP revenue to improve and expand on these current

services. The program maintains numerous informational sign boards, permit registers, and trailhead kiosks used by visitors intending to access elevations above 9,500 feet on Mt. Hood. Specialized patrols by staff are provided to educate visitors, monitor, and mitigate environmental impacts, and enforce regulations. Staff provide human waste pack out bags and remove trash and human waste from climbing routes and other areas on Mt. Hood. The Forest Service Northwest Avalanche Center provides avalanche forecasting during the winter and early portion of the climbing season and maintains weather stations that provide vital conditions information year-round. The climbing ranger provides safety advisories in the form of climbing condition reports to the public via the forest website. The climbing ranger also shares information with the forest public affairs and visitor information staff for public and media inquiries.

Special Recreation Permit Boundary and Requirements

A two-day or annual permit will be required for all visitors travelling above 9,500 feet in elevation within the Mount Hood Wilderness. The permit will be required year-round for all persons entering the permit boundary, included commercially guided climbers. Figure 1 below shows the primary climbing routes used to access Mt. Hood at or above 9,500 feet in elevation in yellow. Two prominent landmarks at approximately 9,500 feet in elevation on the south side of the mountain are Triangle Moraine and Illumination Rock. Table 1 provides additional information about the trailheads and infrastructure that support the climbing program by providing the access to climbing routes.

Figure 1. Map of Mt. Hood depicting 9,500 ft. elevation band in red (climbing permit boundary) and primary climbing routes in yellow.

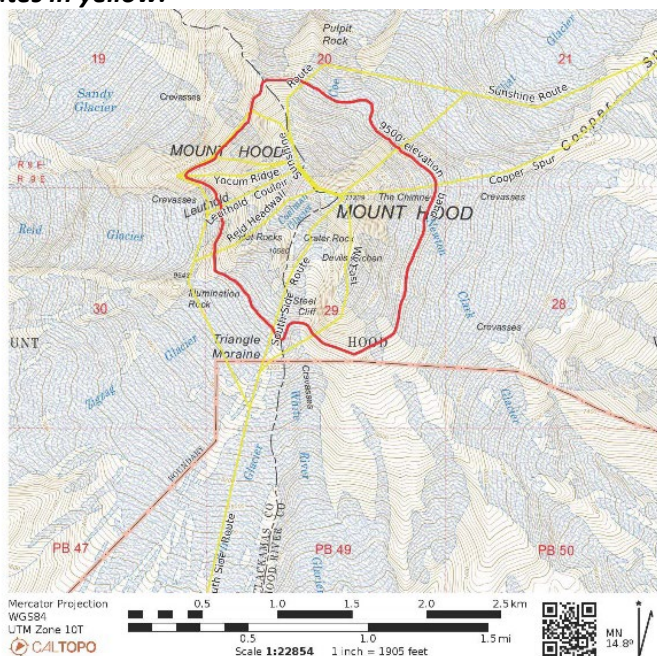


Table 2. Trailheads providing access to primary climbing routes

Trailhead(s)	Infrastructure	Parking Capacity	Use Level (Low, Med, High)
Timberline Trailheads	Climber registration and information facilities, toilets	100+	High
Cloud Cap	Information kiosk, fee station, picnic tables, trash can, toilet	30	High
Tilly Jane Sno-Park	Information kiosk	5-10	Medium
Top Spur Trailhead	Information kiosk, portable toilet, picnic table, trash can	5	Low

Permit Fees and Anticipated Revenue

The Mt. Hood SRP permit will provide two options for users, including a two-day permit and annual permit. The table below summarizes the projected revenue from the permit system. There is some uncertainty with predicting revenues of the proposed SRP fee. The predicted revenues in this section are intended to suggest approximate revenues.

Table 3. Predicted permit revenue

Two-Day Permit Fee/Climber	\$20	\$20/person per permit for climbers all ages.
Annual Permit/Climber	\$50	\$50/person for annual permit for climbers all ages
Percentage of permits anticipated to be annual permits	5%	Forest Service anticipates approximately five percent of the total permits sold will be for annual use and the remaining 95 percent will be for two-day use.
Total Permits	7,500	Anticipated total number of permits per year
TOTAL	\$161,250	Anticipated annual fee collections for climbing program
95% of fees	\$153,188	Forest portion of annual fee collection for Climbing Program
5%	\$ 8,063	Regional Office portion of annual fee collection from climbing permit sales.

Planned uses for the Special Recreation Permit Fee Revenue

- Maintain consistent pre-climb information in the form of relevant and timely conditions reports, photos, social media content, and information to public affairs and visitor information services staff. Broadcast more frequent condition reports with a wider audience. Emphasize and increase education, especially around safety and wilderness stewardship.
- Provide direct financial support for Forest Service partnerships with local Sherriff's offices and search and rescue (SAR) organizations for their mountain rescue and climber safety messaging work. Assist the Timberline ski area with maintenance of a climber's route through their permit area that avoids ski and snowboard operations. Encourage public compliance to minimize conflicts with permittee operations.
- Maintain and improve the climber registration area at the Timberline ski area including climbing information signage, condition reports, and climber registration station.
- Provide and enforce a WAG-bag human waste pack-out system to reduce human waste accumulation on all alpine climbing routes, especially on the south side routes.
- Maintain a year-round restroom in the climber registration area at the Timberline ski area
- Specialized training for staff and volunteers involved in climbing patrols.
- Support visitor services at Forest Service offices and partner organizations to provide messaging on mountain conditions, the new permit program, and area information.
- Secure matching grants and leverage additional funding to support program elements and infrastructure improvements.
- To support this work, the climbing program will be supported as follows:
 - Increased climbing ranger staffing from one seasonal ranger to one permanent, full-time program manager and two temporary seasonal climbing rangers during the primary climbing season from April through July to provide for 7-day coverage with two rangers at a time.
 - Station climbing rangers (paid and volunteers) on busy routes during the spring and early summer weekends to provide route, weather, and condition information and assist with search and rescue operations. Rangers will also perform permit compliance checks, wilderness regulation education and enforcement, rehabilitate impacted areas, and maintain access trails.
 - Transportation/vehicle needs for additional climbing ranger staff.

Climbing Program – Proposed Budget

Table 4. Proposed program elements and estimated cost per year

Item	Estimated Cost	Description
Forest Service Personnel		
Climbing Program Manager GS-9, 1/3 of annual cost	\$30,507	Provides program oversight, supervises climbing rangers, patrols climbing routes, performs administrative tasks
GS-5/6 seasonal backcountry climbing rangers (2)	\$46,800	Duties focused on climbing route patrol focused on public outreach, resource protection, and permit compliance along climbing routes
Visitor Information Services	\$20,000	Visitor services provided at FS offices, online, and at Timberline Lodge. Work to include an update to the Mt. Hood climbing information video
Total Personnel Costs	\$97,307	
Partnership Costs		
SAR support for Sherriff's offices and volunteers	\$10,000	County Sherriff offices, Portland Mountain Rescue, Hood River Crag Rats
Total Partnership Costs	\$10,000	
Other Costs		
Transportation	\$6,000	One permanent fleet vehicle for climbing ranger staff
Materials and Supplies	\$5,000	Safety equipment, tools, and maintenance of climber registration area
WAG bag program	\$12,500	Provision of WAG bags to reduce improper disposal of human waste
Trailhead and facility enhancements	\$20,000	Replacement of signage, gates, trash receptacles. Site plan updates for climber and trailhead facilities. Year-round restroom for climber registration and improved staging area for SAR.
Total Other Costs	43,500	
Estimated Annual Program Costs = \$150,807		

Compliance Plan

The annual and two-day permits will be available for sale online at recreation.gov as a digital activity pass. Visitors will be able to get a permit in advance of, or on the day of, their visit.

Climbing routes will be patrolled by climbing rangers and volunteers during the peak climbing season. Increased staffing would allow such patrols, including public contacts and compliance checks for valid permits, seven days a week during peak season. In the first year of implementation, a focus of education on the new permit requirement is expected, with compliance being the goal in subsequent years. Cellular coverage in many areas on Mt. Hood will allow for digital permits to be obtained on climbing routes, if needed, during a compliance check.

List of Major Partners and Cooperators for the Climbing Program

- Portland Mountain Rescue
- Hood River Crag Rats
- Clackamas County Sheriff's Office
- Hood River County Sheriff's Office
- Northwest Avalanche Center
- Mountain Wave Search and Rescue
- RLK-Timberline Lodge Operator

List of Special Use Permittees authorized to guide climbers on Mt. Hood

- Northwest School of Survival
- TMG Timberline Mountain Guides
- Mazamas

Special Recreation Permit Fee Management Plan Mt. Hood Climbing Program Mt. Hood National Forest

Introduction

The Forest Service is proposing a Special Recreation Permit fee for visitors climbing above 9,500 feet in elevation on Mt. Hood within the Mt. Hood National Forest and the Mount Hood Wilderness. The Federal Lands Recreation Enhancement Act (FLREA) authorizes a Special Recreation Permit (SRP) and SRP fee for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, and motorized recreational vehicle use [16 U.S.C. 6802(h)]. Special Recreation Permits are issued as a means of ensuring the protection of natural and cultural resources, providing for the health and safety of visitors, providing visitor services, and helping cover the higher costs of providing these specialized recreation opportunities.

Under the Mt. Hood Climbing Program SRP plan, an SRP and associated SRP fee would be required for all use on Mt. Hood above 9,500 feet in elevation. The SRP fee component of the plan includes two summit permit options, a two-day permit, and an annual permit. The two-day permit provides access above 9,500 feet for a 48-hour period specified at the time of purchase and is expected to be the more common permit purchased by visitors. The annual permit provides unlimited access above 9,500 feet and is expected to be more commonly purchased by locals who may backcountry ski/snowboard or climb Mt. Hood multiple times during the year.

No fee is currently charged under the authority provided by the FLREA for this specialized recreational activity. The establishment of a fee is needed to provide adequate funding for the Forest Service to sustainably manage the Mt. Hood Climbing Program. This funding is necessary to provide adequate staffing for specialized climbing patrols and for resource protection within the Mount Hood Wilderness. Funding is also needed for climber safety information and education, health and sanitary condition improvements, infrastructure maintenance and improvements, and to support search and rescue (SAR) groups that have long been dedicated to emergency response on Mt. Hood.

This Special Recreation Permit Fee Management Plan outlines the rationale for the SRP, how the SRP revenue will be used to support the specialized recreation experience managed under the Mt. Hood Climbing Program, and the requirements of the SRP.

Background Information

Mt. Hood provides a scenic backdrop to the Portland metro area and is popular with local, regional, national, and international visitors. The iconic landscape of the Mt. Hood National Forest attracts over two million visitors annually. The Forest Service has the responsibility of ensuring the area is managed to protect resources while still providing recreation opportunities.

Visitor use monitoring data show that the Mt. Hood National Forest experienced a 40 percent increase in visitation from 2006 to 2016. Data collected in 2021 indicate a continued increase in visitation across the Forest. Forest Service personnel, SAR groups, and outfitter/guides who operate on Mt. Hood have similarly seen the number of visitors climbing the mountain increase significantly in recent years.

Estimates indicate over 10,000 climbers attempt to climb Mt. Hood each year. Much of this use occurs during the peak climbing season of April through July. The south side climbing routes, including the Pearly Gates and Old Chute variations, are the most popular and are considered the easiest routes to the summit; however, the climb is still technical and requires specialized equipment, experience, and good physical conditioning. Other routes accessible from



National Forest System trailheads on the eastern and northern sides of the mountain are also used to access Mt. Hood's summit and upper elevations. As the number of climbers has increased, the number of injuries and fatalities have also increased. Since climbing Mt. Hood became popular in the early 1900's, there have been over 135 climbing fatalities on the cascade volcano. Rescues led by local Sherriff's offices, with assistance from volunteer SAR organizations, have increased as well. Clackamas County Sherriff's Office averages eight high-elevation rescues on Mt. Hood each year. Hood River Sherriff's Office has responded to 28 high elevation SAR incidents over the past nine years, with a majority of those incidents occurring in the last three years. Between 2013 and 2017, 31 percent of the calls that Portland Mountain Rescue (PMR) responded to were for climbers on the upper elevations of Mt. Hood.

Recreational use has negatively impacted both natural resources and visitor experiences in the area. The area covered under the proposed SRP program is located completely within the Mount Hood Wilderness. Maintaining the wilderness character of the area is a legal requirement. Public health and safety issues result from the improper disposal of human waste. The SRP fee is needed to sustainably manage recreation use in the alpine upper elevations of Mt. Hood.

Existing Climbing Program Management and Challenges

Program Staffing

The Mt. Hood National Forest has one non-permanent, seasonal climbing ranger that patrols the area and interacts with climbers. This level of staffing allows only minimal coverage of popular climbing routes during peak climbing season. The lack of a second ranger is a safety concern and greatly limits the sole ranger's ability to cover the routes, make adequate climber contacts, and accomplish effective maintenance, monitoring, and enforcement work. Due to the specialized technical skills and training required of a climbing ranger, it is not feasible for staff of other programs to help cover climbing ranger duties.

Public Safety

Climbers must possess alpine mountaineering skills to ascend and descend all routes accessing the summit of Mt. Hood. It is not uncommon, though, for visitors with little to no mountaineering experience to attempt to climb and summit Mt. Hood. Visitors come from around the world to attempt summit climbs. The ease of access to the mountain base via a state highway and the high levels of use on climbing routes often result in accidents requiring rescue.



To support SAR personnel and volunteers, the Forest Service maintains a voluntary climbing register. Climbers are encouraged to sign in at the register with their name and information. This has helped provide baseline information for SAR efforts. The climber registration area is located within the Wy'East Day Lodge at the Timberline ski area. Climbing registration, and the required wilderness permit, are currently free for users. The wilderness permit is required from May 15 through October 15. Visitors must have a copy of the completed permit in their possession during their visit to wilderness. Permits are free and self-issued at trailheads and wilderness boundaries. These permits help the Forest Service keep tally of how many visitors come to the Mt. Hood Wilderness every year.

Climbers must have a wilderness permit in their possession year-round when on the south side climbing route of Mt. Hood. Permits are available at the Wy'East Timberline Day Lodge.

Group size is limited to 12 of any combination of people and pack or saddle stock.

With only one ranger on staff, the amount of time that can be spent on upkeep of the climber registration area is severely limited. The Forest Service partners with Timberline Ski Resort to maintain the climber registration area.

Facility Limitations

The parking area used by climbers to access the most frequented climbing routes is located within the Timberline ski area parking lots. Parking in this location is limited and increasing parking capacity requires significant planning efforts. A site plan is needed to provide more adequate parking and improve configuration of the climber registration area and trailhead. Additionally, the current climber registration area badly needs improvements and lacks a toilet facility that can be open year-round, 24 hours a day. These infrastructure needs are currently unfunded.

Waste Removal Program- WAG Bags

Human waste pack-out programs prevent negative impacts to natural resources, wildlife, and visitor experiences resulting from improper disposal of human waste. Currently, the Forest Service provides “Blue Bag” human waste pack out bags, which are similar to dog waste bags. The “Blue Bag” system is inexpensive to purchase; however, it requires significant assembly time by Forest Service personnel and the single use, fragile plastic bags are generally disliked by climbers. Waste Alleviation and Gelling (WAG) bags, preferred by climbers for their robust nature and multiple use capacity, should be provided for all permit holders to maximize the program’s effectiveness and eliminate the significant workload of blue bag assembly. The climbing program lacks sufficient funding to provide WAG bags for all climbers.

Volunteers and Partnerships

The current climbing program lacks sufficient Forest Service staffing capacity to coordinate, recruit, educate, and retain volunteers and build partnerships that could thrive and contribute to work of the program. Current partnerships include Portland Mountain Rescue and the Hood River Crag Rats, crucial partners assisting search and rescue efforts led by local Sherriff’s offices. Partnership support from the Forest Service is limited; the Forest Service provides radio batteries and some other minor equipment and supplies. No additional funding to support partnership programs is available from the Forest Service under the current budget.



Climbing Program Budget

The following table provides the current Mt. Hood Climbing Program’s costs per year, which come directly from the annual allocation of funding provided for delivery of the Forest’s developed recreation, wilderness, and trails programs.

Table 1. Current climbing program and costs (FY22)

Item	Annual Cost (FY22)	Item Description
Personnel		
Climbing Ranger GS-6, Forest Protection Officer – 120 days	\$23,400	Full time (temporary) seasonal climbing ranger, providing information and patrolling climbing routes for resource protection.
Visitor Services Support	\$10,000	Climber education at district offices, climber registration area, and online.
Total Personnel Costs	\$33,400	
Fleet (Vehicles)		
Seasonal Fleet	\$2,500	Transportation for seasonal Climbing Ranger
Total Fleet Costs	\$2,500	
Other Costs		
Blue Bag Program	\$4,000	Provided to reduce improper disposal of waste
Materials and Supplies	\$3,000	Safety and climbing equipment, uniform, signage, and associated supplies
Training	\$2,000	Forest protection officer, mountaineering, avalanche, and emergency medical training.
Total Other Costs	\$9,000	
Total Program Cost	\$44,900	

Rationale for the Special Recreation Permit

Special Recreation Permit Need

Climbing Mt. Hood above the 9,500 ft elevation is a specialized recreational activity as it requires special equipment and skills in a sensitive alpine wilderness environment. Substantial resources are needed to support this recreational use to provide for visitor safety and protect sensitive wilderness resources. The Mt. Hood climbing program currently provides specialized services that qualify as acceptable uses of SRP revenue as outlined in FSH 2309.13 CH 32.4. The forest intends to utilize SRP revenue to improve and expand on these current services. The program maintains numerous informational sign boards, permit registers, and trailhead kiosks used by visitors intending to access elevations above 9,500 feet on Mt.

Hood. Specialized patrols by staff are provided to educate visitors, monitor and mitigate environmental impacts, and enforce regulations. Staff provide human waste pack out bags and remove trash and human waste from climbing routes and other areas on Mt. Hood. The Forest Service Northwest Avalanche Center provides avalanche forecasting during the winter and early portion of the climbing season and maintains weather stations that provide vital conditions information year-round. The climbing ranger provides safety advisories in the form of climbing condition reports to the public via the forest website. The climbing ranger also shares information with the forest public affairs and visitor information staff for public and media inquiries. The forest also works with numerous volunteer organizations including SAR partners.

Special Recreation Permit Boundary and Requirements

A two-day or annual permit will be required for all visitors travelling above 9,500 feet in elevation within the Mount Hood Wilderness. The permit will be required year-round for all persons entering the permit boundary, included commercially guided climbers. Figure 1 below shows the primary climbing routes used to access Mt. Hood at or above 9,500 feet in elevation in yellow. Two prominent landmarks at approximately 9,500 feet in elevation on the south side of the mountain are Triangle Moraine and Illumination Rock. Table 1 provides additional information about the trailheads and infrastructure that support the climbing program by providing the access to climbing routes.

Figure 1. Map of Mt. Hood depicting 9,500 ft. elevation band in red (climbing permit boundary) and primary climbing routes in yellow.

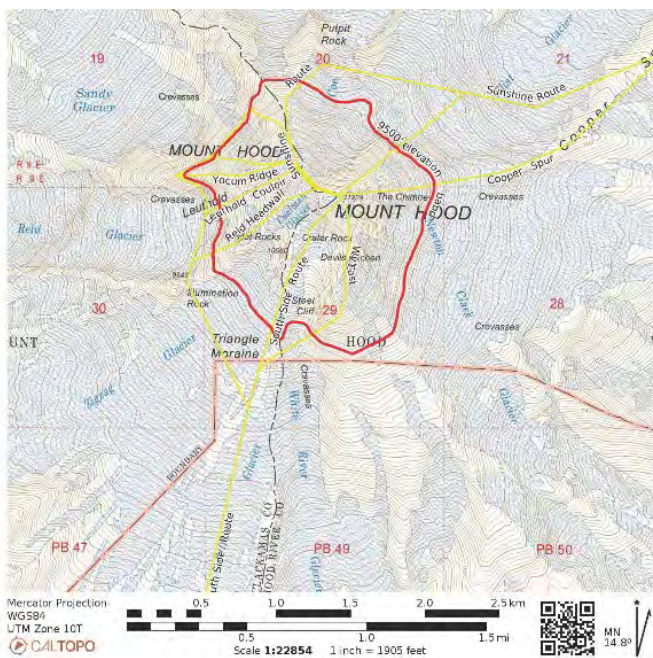


Table 2. Trailheads providing access to primary climbing routes

Trailhead(s)	Infrastructure	Parking Capacity	Use Level (Low, Med, High)
Timberline Trailheads	Climber registration and information facilities, toilets	100+	High

Cloud Cap	Information kiosk, fee station, picnic tables, trash can, toilet	30	High
Tilly Jane Sno-Park	Information kiosk	5-10	Medium
Top Spur Trailhead	Information kiosk, portable toilet, picnic table, trash can	5	Low

All existing wilderness regulations will still apply, including the group size limit of 12. The Forest is considering whether the climbing permit may be used as the wilderness permit, as it will still provide a tally of how many visitors come to the Mt. Hood Wilderness each year.

Permit Fees and Anticipated Revenue

The Mt. Hood SRP permit will provide two options for users, including a two-day permit and annual permit. The table below summarizes the projected revenue from the permit system. The predicted revenues in this section are intended to suggest approximate revenues.

Table 3. Predicted permit revenue

Two-Day Permit Fee/Climber	\$20	\$20/person per permit for climbers all ages.
Annual Permit/Climber	\$50	\$50/person for annual permit for climbers all ages
Percentage of permits anticipated to be annual permits	5%	Forest Service anticipates approximately five percent of the total permits sold will be for annual use and the remaining 95 percent will be for two-day use.
Total Permits	7,500	Anticipated total number of permits per year
TOTAL	\$161,250	Anticipated annual fee collections for climbing program
95% of fees	\$153,188	Forest portion of annual fee collection for Climbing Program
5%	\$ 8,063	Regional Office portion of annual fee collection from climbing permit sales.

Planned uses for the Special Recreation Permit Fee Revenue

- Maintain consistent pre-climb information in the form of relevant and timely conditions reports, photos, social media content, and information to public affairs and visitor information services staff. Broadcast more frequent condition reports with a wider audience. Emphasize and increase education, especially around safety and wilderness stewardship.
- Provide direct financial support for Forest Service partnerships with local Sherriff’s offices and search and rescue (SAR) organizations for their mountain rescue and climber safety messaging work. Assist the Timberline ski area with maintenance of a climber’s route through their permit area that avoids ski and snowboard operations. Encourage public compliance to minimize conflicts with permittee operations.

- Maintain and improve the climber registration area at the Timberline ski area including climbing information signage, condition reports, and climber registration station.
- Provide and enforce a WAG-bag human waste pack-out system to reduce human waste accumulation on all alpine climbing routes, especially on the south side routes.
- Maintain a year-round restroom in the climber registration area at the Timberline ski area
- Specialized training for staff and volunteers involved in climbing patrols.
- Support visitor services at Forest Service offices and partner organizations to provide messaging on mountain conditions, the new permit program, and area information.
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- To support this work, the climbing program will be supported as follows:
 - Increased climbing ranger staffing from one seasonal ranger to one permanent, full-time program manager and two temporary seasonal climbing rangers during the primary climbing season from April through July to provide for 7-day coverage with two rangers at a time.
 - Station climbing rangers (paid and volunteers) on busy routes during the spring and early summer weekends to provide route, weather, and condition information and assist with search and rescue operations. Rangers will also perform permit compliance checks, wilderness regulation education and enforcement, rehabilitate impacted areas, and maintain access trails.
 - Transportation/vehicle needs for additional climbing ranger staff.

Climbing Program – Proposed Budget

Table 4. Proposed program elements and estimated cost per year

Item	Estimated Cost	Description
Forest Service Personnel		
Climbing Program Manager GS-9, 1/3 of annual cost	\$30,507	Provides program oversight, supervises climbing rangers, patrols climbing routes, performs administrative tasks
GS-5/6 seasonal backcountry climbing rangers (2)	\$46,800	Duties focused on climbing route patrol focused on public outreach, resource protection, and permit compliance along climbing routes
Visitor Information Services	\$20,000	Visitor services provided at FS offices, online, and at Timberline Lodge. Work to include an update to the Mt. Hood climbing information video
Total Personnel Costs	\$97,307	
Partnership Costs		
SAR support for Sherriff’s offices and volunteers	\$10,000	County Sherriff offices, Portland Mountain Rescue, Hood River Crag Rats
Total Partnership Costs	\$10,000	
Other Costs		
Transportation	\$6,000	One permanent fleet vehicle for climbing ranger staff
Materials and Supplies	\$5,000	Safety equipment, tools, and maintenance of climber registration area
WAG bag program	\$12,500	Provision of WAG bags to reduce improper disposal of human waste
Trailhead and facility enhancements	\$20,000	Replacement of signage, gates, trash receptacles. Site plan updates for climber and trailhead facilities. Year-

		round restroom for climber registration and improved staging area for SAR.
Total Other Costs	43,500	
Estimated Annual Program Costs = \$150,807		

Compliance Plan

The annual and two-day permits will be available for sale online at recreation.gov as a digital activity pass. Visitors will be able to get a permit in advance of, or on the day of, their visit.

Climbing routes will be patrolled by climbing rangers and volunteers during the peak climbing season. Increased staffing would allow such patrols, including public contacts and compliance checks for valid permits, seven days a week during peak season. In the first year of implementation, a focus of education on the new permit requirement is expected, with compliance being the goal in subsequent years. Cellular coverage in many areas on Mt. Hood will allow for digital permits to be obtained on climbing routes, if needed, during a compliance check.

List of Major Partners and Cooperators for the Climbing Program

- Portland Mountain Rescue
- Hood River Crag Rats
- Clackamas County Sheriff’s Office
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- Northwest Avalanche Center
- Mountain Wave Search and Rescue
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List of Special Use Permittees authorized to guide climbers on Mt. Hood

- Northwest School of Survival
- TMG Timberline Mountain Guides
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Columbia River Gorge National Scenic Area Multnomah Falls and Waterfall Corridor Timed Use Permit Fee Proposal

Background

The Columbia River Gorge National Scenic Area has seen a significant increase in recreation visitation over the last 10 years. Between 2011 and 2021 visitor use has increased over 50% to 2.0 million visitors annually. Recreation use along the popular Historic Columbia River Highway (HCRH) is over 1.2 million visitors. This increase in recreation use has resulted in overwhelming congestion on the HCRH and Multnomah Falls, overflowing parking lots and safety issues related to congestion.

The Forest Service, Oregon Department of Transportation, Oregon Parks and Recreation Department and Multnomah County with funding from the Federal Highway Administration Federal Land Access Program collaborated to produce the Historic Columbia River Highway Congestion and Transportation Safety Improvement Plan. The plan identified short, medium and long term strategies to improve congestion, safety and visitor experience.

As visitation continued to increase along the HCRH in the highly popular “waterfall corridor” and Multnomah Falls Exit 31, congestion and traffic safety issues continued to increase as well. During busy weekends it is not uncommon



to take an hour to travel less than a half a mile on the HCRH to access Multnomah Falls with backups on Interstate 84 trying to access Multnomah Falls exit 31 parking. The congestion also increased response times for agency staff and emergency responders to incidents in the corridor. In 2022, this multiagency group piloted two Timed Use Permits. The goal of the project was to reduce

congestion, improve pedestrian and vehicle safety and improve visitor experience. The Permit system was a strategy identified in the Congestion and Transportation Safety Improvement Plan.

The two Timed Use Permits, one for the HCRH referred to as the Waterfall Corridor and one for Multnomah Falls Exit 31, were required between May 24th thru September 5th and were allocated on an hourly basis between 9:00 a.m. 6:00 p.m. The Timed Use Permits were available through Recreation.Gov. A reservation transaction fee of \$2.00 was charged for each transaction. None of these funds are returned to the Forest, but are paid to the Rec.Gov contractor Booze Allen to operate the system. Agencies did not consider reservation transaction fees a recreation fee, however during a recent litigation involving the BLM in NV over the \$2.00 transaction fee, the court considered the reservation transaction fee a recreation fee. The court determined that Agencies should follow existing

policies for approving including public participation and Recreation Resource Advisory Committee review.

After evaluating public feedback and several metrics such as average daily traffic counts, parking capacity, travel time for Emergency Services, etc. the Timed Use Permits proved to be successful and met primary objectives of reducing congestion and improving safety and visitor experience.

Public Engagement

Extensive public engagement was initiated as the Pilot program was being developed and was also collected during the duration of the Timed Use Permit period through an ODOT online survey, email, phone calls, Ask ODOT and Rec.Gov.

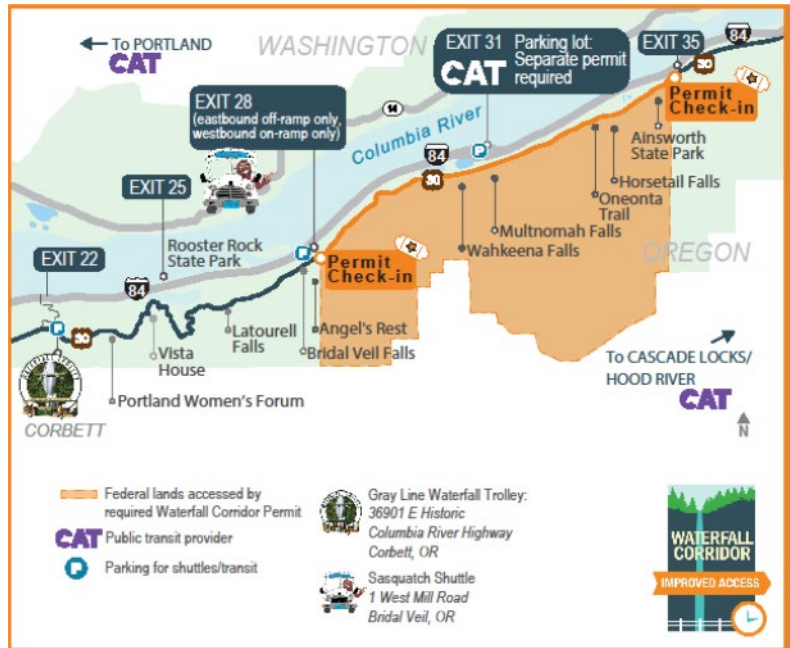
Over 1900 comments were received and analyzed based on the tone of the comments (Positive, Negative and Neutral). Overall, 47% were recorded as positive, 38% negative and 15% neutral.

General Public Comments include the following.

- The two permit system was confusing.
- Visitors familiar with the area reported much less congestion, increased ability to park as compared with years past.
- There was a misconception that the permits were a “fee” for parking.
- Uncertainty of pre-9 am and post-6 pm visits.

Examples of Positive Feedback

- Everybody was really helpful at the checkout point and everything was smooth and fast
- Very efficient and nicely organized.
- There was plenty of parking! Warm but beautiful day to make my way to the top for the first time with some friends that flew in for the weekend. They absolutely loved it!
- No traffic problems, easy to find parking. Just like in the old days.
- Went on Labor Day weekend on the Saturday and got the 10-11am slot. Arrived around 10:15am and there were around 10-15 spots left for us which was great! It was busy but very fun and accessible for any level hiker!
- It was amazing to use this system to get the permit. The Falls were amazing! It wasn't crowded.
- Very good idea smooth travel min crowds.



Examples of Negative Feedback

- Good luck trying to book a pass for more than one person. The checkout procedure is the worst
- We found timed tickets very stressful. Trying to estimate what time you would get to a particular location when you are out for the day. In the end we bought several for the same day to give us options. Be aware, visitor center closes before last timed ticket.
- This was terrible. We were on our way to Multnomah Falls on the scenic route when we saw this sign about timed use permits, not even knowing what it referred to. Then we had to stop, download an app and pay the fee, delaying us about 15 minutes. Then when we got to the Falls there was no parking anyway, so we just kept going. Much better would have been the people assigned to stop cars to collect \$2 from every car and give them a sticker! This was a terrible way to do it! What do people from other countries, elderly, and those without smart phones do?
- Forced to pay \$2 just to drive down the highway and find out there was no parking anywhere. Had to drive all the way back to the interstate just to make a u turn and park in the interstate access where there was plenty of free parking.
- I had timed ticket for Multnomah Falls, but we had to skip it - parking was full and there was a queue of cars waiting for a parking spot. For us it means that this system doesn't work.

Fee Proposal

Continue the Multnomah Falls and Waterfall Timed Use Permits. Timed Use Permits would be required during the peak season typically Memorial Day thru Labor Day. Permits will be allocated on an hourly basis between 9:00 a.m. and 6:00 p.m. Permits will be available through Recreation.Gov. with the associated Rec.Gov \$2.00 reservation transaction fee. The Waterfall Corridor Time Use Permit may be modified to incorporate lessons learned from 2022 (modify check-in areas, explore sustainable funding options, etc.).