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Malcolm Hamilton
Mt. Hood National Forest
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RE: Comments on Preliminary Assessment, Developed Recreation Site
Concessionaire Permit Proposal

February 14, 2011

Dear Mr. Hamilton,

The following are the comments of the undersigned groups and individuals on the Preliminary Assessment ("PA") and associated materials for the Developed Recreation Site Concessionaire Permit Proposal. We sincerely hope that, in response to the outpouring of written and verbal public opposition voiced in response to the proposed privatization of management at the 27 campgrounds and Bagby, Mt. Hood National Forest ("MHNF") will change its course and pursue a new recreation management strategy. We support Alternative A, the no action alternative. We understand that this is a complex issue and that funding for recreation is limited. We are willing and ready to work with you to find appropriate solutions to campground and hot springs management, and we appreciate the opportunity to comment on this controversial proposal.

The following is a summary of our main concerns. Following this list are our comments on the various portions of the PA and then finally our site specific recommendations.

Main Concerns

1. The Forest Service is failing to provide an adequate quantity and quality of recreation opportunities despite recreation's prominence in the multiple-use mandate.

The National Forest Management Act ("NFMA") lists recreation as the first of the "multiple uses" national forests should be managed for. Recreational activities like exploring, hunting, and fishing, were among the chief catalysts for the setting aside of public lands and their management as national forests. Congress has continued to pass laws clarifying the importance of recreation in national forest lands. The Forest Service's multiple use mandate, as outlined in the Multiple-Use Sustained Yield Act of 1960 ("MUSYA") and NFMA, prioritize recreation by placing it as the first of the multiple uses.

In particular, NFMA requires:

"In developing, maintaining, and revising plans of the National Forest System pursuant to this section, the Secretary shall assure that such plans –

(1) provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with [MUSYA], and, in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness..." 16 U.S.C. § 1604(e).

MUSYA's policy statement explains:

It is the policy of the Congress that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes. 16 U.S.C. §528.

Despite clear mandates prioritizing recreation, it seems like the Forest Service as a whole has deprioritized this program and has instead chosen to focus its

energy on other programs, especially timber. New timber sales are planned each year, but the agency is not planning new hiking trail systems or even significant improvements to existing trails for quiet recreationists. Two recent timber sale proposals, Bear Springs and Cascade Crest, were withdrawn in response to appeals pointing out their significant legal flaws. Hundreds of agency hours were directed toward planning these sales, wasted hours that could have been better spent improving public access to recreation in our urban forest.

Maintaining campgrounds is a critical component of managing recreation in Mt. Hood National Forest. Managing campgrounds gives Forest Service staff a much needed opportunity to interact with recreationists and learn more about the needs of this community. The Forest Service cannot adequately serve those needs if it has minimal interactions with the community at large and can only guess at their needs. Agency interactions with forest users are increasingly held only in formal settings and more field interaction is sorely needed for the Forest Service to properly manage for this aspect of the multiple-use mandate.

It is vital for the Forest Service to get back in line with its mission and reprioritize recreation. Adopting the no action alternative and making campground management a priority would to accomplish that vital goal. Increased funding for recreation is of course a critical element of this need and MHNH can look to its partners in the community to work to bring this matter to our decision makers. With a tough economy leading many families to seek out low cost vacations, an obesity epidemic causing people to look for ways to get active, and gateway communities needing tourist dollars more than ever, now is the time for MHNH to make managing recreation its priority.

2. This proposal demonstrates and perpetuates a disturbing trend toward public resources being managed for private profit.

The Forest Service itself recognizes anecdotal evidence showing that recreationists prefer to interact with agency staff than concessionaire staff. There is something about the fact that these sites are public that is really significant for some members of the community. People in the community enjoy the experience of talking about our shared public lands with the public employees entrusted with managing them. Campground concessionaires recognize this is important for people and design uniforms for their staff that mimic Forest Service uniforms. While the outfit might look the same, campers quickly realize that these folks are not Forest Service employees and they lack the breadth of knowledge recreationists expect. Most do not expect that their fees are primarily for private profit. Concessionaire uniforms might attempt to replicate staff uniforms, but concessionaire's staff often lack the knowledge campers desire. This leads to campers having sub-par experiences in federal lands.

Some campers are also dismayed to learn that their money is not going to the Forest Service, but rather to a private entity. People who seek out campgrounds in MHNH know that the agency is funded through taxpayer dollars and expect their fees to go back to the agency to supplement funding provided by congress. Campgrounds in Mt. Hood presently managed by concessionaires are typically more expensive than campgrounds managed by agency staff and people are oftentimes not aware of who they are paying. It is interesting to note that MHNH allows concessionaires to charge more for a campsite than it charges, allowing concessionaires to create a financially viable model, but it did not consider creating a similarly viable model for itself as an alternative to the proposed action.

3. Private concessionaires regularly hire employees who absolutely should not be entrusted with the management of MHNH's campgrounds.

Private concessionaires are not bound by the same obligations and are not held to the same high standards as the Forest Service. Their staff do not have to go

through the rigorous process of getting hired by the federal government. Bad campground hosts have caused many a crisis for people seeking good camping experiences in MHNH. People regularly come to Bark to share shocking stories of inappropriate campground host behavior. A group of canvassers from Bark faced significant harassment at the Wyeth campground from a campground host this past summer. When that host called law enforcement, the officer who responded to the call apologized to the group. He explained that this particular host just didn't really like it when anyone camped at his campground and often unreasonably lashed out at campers. This is a terrible waste of time for a law enforcement officer and a terrible experience for a group of campers, some of whom had never visited MHNH before.

Another individual, who has contacted Forest Service staff repeatedly with this story, told us his story of taking a group of underprivileged children to the Raab campground to teach them to fish and camp. When drunken rowdiness and shooting continued well past midnight he sought help from the campground host, who told him he had just arrived at the campground and hadn't even done a walk around to get oriented. This person was completely unable to control the campers or help in any way. When the shooting started again in the morning this individual drove 45 minutes to call law enforcement, waiting another hour and a half for help to arrive, and then had to repeat the ritual later that day when people would not stop shooting at the river, despite the presence of children wading in it as they learned to fish. The campground host failed to provide any assistance. These are just a few of many similar stories of bad campground hosts.

We have learned from several sources that in recent years approximately one dozen campground hosts have been arrested for drug distribution, and that law enforcement has run background checks on campground hosts only to discover they are either dangerous felons or have warrants out for their arrest. People are taking their families to campgrounds where the hosts are dealing

drugs. This is a completely unacceptable situation. Campers think of these people as authority figures and harbor reasonable expectations that their campground hosts are both qualified to keep the campground under control, that they are there for the benefit of campers, and that they are safe people to approach with camping related concerns. The Forest Service would not hire people without first running a background check and determining that the individuals are reasonably competent. This is a prime reason why these 27 campgrounds and Bagby should continue to be managed by the Forest Service. Based on the experiences users are having at sites currently managed by concessionaires, it is clear that by passing campground management off to concessionaires the Forest Service is failing to ensure recreation is a well managed program. Expanding the scope of the recreation program will constitute another step in the wrong direction of failing to achieve NFMA's recreation mandate.

4. The Forest Service must work closely with the community to determine how to best manage all recreation sites, especially Bagby.

Bagby Hot Springs is a beloved place of rejuvenation for thousands of visitors each year. For many, visits to Bagby provide spiritual inspiration as well as physical relaxation. We do not dispute that management of this site presents significant challenges due to its heavy use, remote location, and established patterns of offensive and unlawful activity. But we urge you to recognize that any change in management of this site must be undertaken with great sensitivity for the responsible users of this site. Various organizations and individuals have contributed thousands of hours of volunteer work at Bagby and were appalled to learn about the recent renovations and possibility of Bagby being managed by private concessionaires. Many believe that one of the most special aspects of Bagby is that soaking is free and therefore accessible for individuals and families with limited incomes.

The Forest Service in general needs to do a better job of reaching out to

stakeholders and volunteers, and this need is dramatically illustrated at Bagby. The work of volunteers from the Northwest Forest Conservancy at Bagby was made famous through an Oregon Field Guide episode. See <http://www.opb.org/programs/ofg/segments/view/1672>. While MHNf often touts the successes of its volunteer programs in its publications, the reality is that the many individuals who do volunteer work in MHNf report dissatisfaction with the experience, often times because agency staff dismiss their suggestions, fail to respond to communications, and generally do not treat volunteers as valued partners. Stakeholders and volunteers provide crucial services throughout MHNf and especially at Bagby, but when decisions are made without them they will often either disengage or develop an adversarial relationship with the agency.

Comments on the PA

I. Purpose and Need

The PA cites to direction from Mt. Hood's twenty-year-old Forest Plan regarding the use of concessionaires for campground management. This direction was in response to the economic climate at that time and was also premised on an assumption that some new sites would be constructed and some old sites would be closed. Operating a forest under such an old Forest Plan is problematic for many reasons and one of them is the simple fact that many of our basic assumptions have changed since 1990. The population has grown considerably and the Forest Service's budget woes have grown increasingly complicated. A new Forest Plan with a fresh take on recreation in Mt. Hood is long overdue.

The PA references the 2007 Recreation Facility Analysis ("RFA") as a guiding document for this process claiming that for "a majority of the sites, it was recommended that there be a change to concession, partner or volunteer operation." PA at 6. The truth is that nine sites were recommended for partner agreements, one site recommended for volunteers, and only three sites

recommended for concessionaires. This is far from a majority and shows that MHNFs' experts did not believe that concessionaires were the answer for these 28 sites. A decreased operating season was recommended for 13 of the sites, but even this does not constitute a majority of the sites.

The PA notes that a concerted effort was made in 2008 to enlist partners, recruit volunteer hosts, and involve interest groups but the efforts were unproductive. Yet we were not able to obtain any specific information about who was contacted and how they were contacted. Establishing working relationships with volunteer and interest groups oftentimes takes strong interpersonal skills and persistence in addition to time and effort, and the PA does not give the impression that anything but a cursory attempt was made at contacting partners, volunteers, and interest groups. We encourage you to select the no action alternative and renew your efforts at creating partnerships that will assist with the management of campgrounds.

It is important to note that once these campgrounds get handed over to concessionaires, the agency's perception is that they are essentially in the hands of private entities permanently. This means that this proposal is for much more than just a simple 5 year contract and this should be more clearly disclosed in the environmental analysis ("EA"). Many members of the public are not aware that this decision will have such long term implications.

We understand that the required competitive process precludes special consideration of non-profit organizations. For this reason, we urge you to continue to manage Bagby and the other 27 sites "using a combination of agency staff, volunteers, and/or organizations where appropriate," as mentioned in the PA. PA at 16.

We also want to note that we appreciate that the Forest Service responded to requests for an open house. It was a critical opportunity for the agency and

recreating public to interact. However, we heard from many individuals who attended the open house that they were disappointed that there was no formal presentation or question and answer session. People who did not feel comfortable directly approaching agency staff with questions had no option other than to just look at a map. We encourage you to provide some type of presentation at future open houses so that participants will understand the purpose of the event, who agency staff are, and what is being proposed.

II. Alternatives

As mentioned above, we support Alternative A, the no action alternative. This alternative would give the agency the opportunity to follow the RFA's recommendation that it decrease the season at some of the sites.

Alternative B would permanently put 28 sites into the hands of private concessionaires who lack the specialized knowledge and skill sets possessed by agency staff and create a culture where almost all of Mt. Hood's campgrounds are privately run. It would signal the agency's departure from campground management, the permanent de-prioritization of campground management, and the loss of interaction with campers that such management allows. We oppose the adoption of all or parts of this alternative.

Given that funding constraints have been cited as the primary driver in this concessionaire proposal, we expected to see an alternative that would attempt to continue Forest Service management of recreation sites at a reasonable level of service. For example, has the Forest Service looked at slightly increasing its fees so they are closer to the levels charged by concessionaires? Why you did not consider an alternative that would narrow the gap between the fees charged at sites managed by the agency versus concessionaire managed sites.

When Mt. Hood manages its campgrounds, it retains 95% of the fees collected at the sites. Regardless of how favorable an offer a concessionaire makes, it is

never going to come close to 95%. An increased agency or agency-selected campground host presence at campgrounds would help encourage campers to actually pay the fee and provide the agency with increased revenue. Privately managed campgrounds in MHNH charge an average of \$15, \$17 if they offer water, yet agency-managed sites run an average of \$10 per night. Why does this discrepancy exist? While Bark does not believe that increasing fees for Americans to use land that already has a tax-base for its management is an appropriate solution, it is surprising that this alternative is not considered. This proposal is premised on the financial limitations of the recreation program so it seems disingenuous that only one solution, concessionaires, was considered. We encourage you to work with partners who understand the special importance of recreation in MHNH to find and pursue new funding sources. Concessionaires are not the only solution to this complicated problem and we encourage MHNH to identify creative new opportunities. Let us know how we can help.

III. Environmental Consequences

a. Recreation

Lack of potable water is cited as a major obstacle for the recruitment of volunteer campground host. PA at 22. This problem could be easily solved with a few inexpensive reusable water storage devices. Having folks volunteer with the Forest Service is an excellent way to allow people to spend time at the campgrounds they love and reduce the Forest Service's campground management expenses. Managing volunteers requires patience and a willingness to meet the volunteers where they are and the proper handling of easy to fix problems, here providing sufficient containers of potable water, goes a long ways towards achieving a good rate of volunteer retention.

In the alternatives analysis in recreation the PA lists the six campgrounds that would most likely be decommissioned under Alternative A. PA at 26. However,

in the RFA only one day use site (Big Eddy) and no campgrounds are recommended for decommissioning. PA at 23. Why is the agency ignoring its own analysis? Also, we appreciate the recognition in the analysis of Alternative B that the decrease of Forest Service visibility would diminish the recreation experience for some users. However, this issue was not given the consideration it deserves. The fact that most members of the public would have no opportunity to interact with agency staff in the field deserves more serious analysis. The loss of the agency's institutional knowledge of the campgrounds and their users also requires additional analysis. Also, the fact that many of the small campgrounds would continue to reflect reduced service levels indicates that this alternative would not even allow the agency to easily meet its own management goals. Hence we are left to wonder why the agency is proposing a controversial plan that does not even solve the problems it faces.

This PA does not consider the different impacts of the proposal on the many different kinds of recreationists in MHNH. Campgrounds have their own cultures and user groups and the impacts of this proposal on these groups will require at least some analysis in the EA. The EA should also evaluate the impacts of reduced field interactions between agency recreation staff and recreationists.

b. Heritage Resources

Bagby should be considered a heritage resource deserving of special consideration. This site and the area around it has been used for hundreds if not thousands of years and its history is rich and varied. The fact that the site in its entirety is not considered a historic site led to the old tubs being destroyed despite that these tubs are icons of our cultural history. fact that many museums and private collections would have been thrilled to house such unique pieces of Oregon's history. We ask you to pursue listing for this entire site, excluding the buildings erected in the 1980s.

c. NEPA Cumulative Effects

The PA states that “[d]ue to the administrative nature of this special use permit, there is no overlap in space and time and there are no NEPA cumulative effects identified.” PA at 32. Just because this is an administrative action does not mean there are no cumulative effects. The renewal of concessionaire permits at the existing privately managed sites is occurring almost concurrently with this proposed action yet it is not analyzed here. The Forest Service must analyze the cumulative impacts of privatizing nearly all of its campgrounds. The PA notes that diminished interaction with agency staff is one negative consequence. The agency’s own loss of institutional knowledge, which would inevitably result from less time in the field with campers, is another. Please make provide a cumulative analysis of all the negative consequences of campground privatization in your EA.

Site Specific Concerns

a) Bagby

As you are aware, this proposal and the associated changes that could occur at Bagby Hot Springs are hot button issues for thousands of people who have come to treasure this place. Many recreationists including Northwest Forest Conservancy (“NFC”)and its members have developed significant expertise on Bagby and its issues through years of volunteerism. The following concerns represent some of the main issues surrounding concessionaire management of Bagby.

One major concern is that the fees to soak will be substantially higher than what the public is accustomed to and this will reduce the ability of the public to enjoy this site. Another concern is that the time allotted for soaks will be limited, or that people will have to pay by set time periods. And what if someone wants to soak, hike, and then soak again: will they have to pay twice? Will nighttime soaking, an activity with many devoted enthusiasts, still be

allowed? How would a for-profit business model change the unique character of Bagby?

Bagby should be managed in a way that puts public benefit before profit. We encourage you to work closely with NFC and other partners to identify what kind of management would serve the public and simultaneously protect Bagby. This means that keeping the access to Bagby free, or at the very least keeping fees as low as possible, should be an agency priority. If a concessionaire takes over this site, MHNF should ensure that low income individuals and families can still access the site for free, either through a donation collection system, volunteerism, or both. An unconventional business plan is going to be necessary to ensure protection of both the resource and the experience. Non-profit management by people who know this site would ease some of the discomfort of concessionaire management and allow a non-profit to further a mission of protecting the area's special resources.

This proposal has upset many people who love Bagby because they feel both left out of the process and that the Forest Service is out of touch with both what the public expects and how Bagby actually functions. Recent renovations featured designs that raise concerns about vandalism, safety, and operational feasibility. Volunteer groups who provided on site services at Bagby always made changes with great thoughtfulness and the help of professionals but the recent changes made by the Forest Service seem to have been made without as much thoughtful consideration. The destruction of the historic tubs, as mentioned above, was extremely upsetting because it showed a lack of sensitivity and subsequently has raised public skepticism. MHNF needs to work closely with the recreating public and especially those who have demonstrated expertise on issues surrounding Bagby to regain the public's trust.

b) Campgrounds

Many of the campgrounds included in the proposed action are loved precisely because they are remote, sparsely utilized, and not heavily managed. These campgrounds allow campers to have the best of both worlds, the facilities of a campground but the peace and quiet of a dispersed camping experience. The PA fails to consider the impacts of increased management presence at these campgrounds. Specific examples of this type of campground include the Barlow Crossing, Barlow Creek, and White River Station campgrounds. These sites, and others like them, should not be included in any concessionaire package because of their rustic nature and location on the historic Barlow trail.

Other campgrounds should not be included because they are extremely popular and provide an excellent opportunity for the Forest Service to interact with the public, allowing for education of both MHNH employees and the recreating public. Positive interactions and educational interactions with the public are crucial at these sites because they are so heavily visited. For example, concessionaires and their staff are going to have to educate visitors to the McCubbins Campground and Overflow Camping Area on the new OHV Plan. The situation there is delicate and proper education is critical for the OHV Plan to work, especially in its first years. Some campers will be used to riding certain trails that are now closed and they may want to gain a better understanding of the new management scheme. Concessionaires and their staff will not have the breadth and depth of knowledge about the OHV plan that is possessed by Mt. Hood's own staff and this could lead to non-compliance with the new OHV Plan. Similar predicaments could arise at campgrounds near existing and newly designated wilderness such as Tilly Jane. If campers can't obtain good information from the folks in charge, they may be tempted to ride bikes or exceed the group size limit when visiting wilderness.

Conclusion

In conclusion, we appreciate your attention to both the spirit and the substance of these comments. We would like to meet with you to further discuss these issues and look forward to working with you to remedy some of the obstacles to effective recreation management on Mt. Hood. Please contact me to set up a meeting and also if you would like any clarification on our comments.

Sincerely,

A handwritten signature in black ink that reads "Lori Ann Burd". The signature is written in a cursive, flowing style.

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