



Environmental Assessment Developed Recreation Site Concessionaire Permit

United States
Department
of
Agriculture

Forest
Service

2012

Mt. Hood National Forest Clackamas, Hood River, and Wasco Counties, Oregon

For Information, Contact:

Malcolm Hamilton
16400 Champion Way
Sandy, Oregon 97030
503.668.1792
mhhamilton@fs.fed.us



Keeps Mill Campground, Mt. Hood National Forest

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

TABLE OF CONTENTS

CHAPTER 1 – PUROSE AND NEED FOR ACTION	3
1.1 Introduction	3
1.2 Document Structure	9
1.3 Background	10
1.4 Desired Conditions	12
1.5 Purpose and Need for Action	14
1.6 Proposed Action	14
1.7 Decision Framework	15
1.8 Management Direction	15
1.9 Public Involvement	16
1.10 Issues	16
CHAPTER 2 – ALTERNATIVES	24
2.1 Alternatives	24
2.2 Project Design Criteria	25
2.3 Other Alternatives Considered	27
2.4 Comparison of Alternatives	29
CHAPTER 3 – ENVIRONMENTAL CONSEQUENCES	30
3.1 Chapter Organization	30
3.2 Recreation	30
3.3 Heritage Resources	39
3.4 Environmental Justice – Civil Rights	39
CHAPTER 4 – LIST OF PREPARERS	41
REFERENCES	41
APPENDIX A – Response to Comments	A1
APPENDIX B – Effects to Physical & Biological Environment	B1
APPENDIX C – Meaningful Measures Standards	C1
APPENDIX D – Recreation Site Development Scale	D1

CHAPTER 1 - PURPOSE AND NEED FOR ACTION

1.1 Introduction

Mt. Hood National Forest (Forest) proposes to operate and maintain 28 developed recreation sites by concession management for approximately 10 years. Included are developed day-use areas and campgrounds scattered throughout the Forest. They are enumerated in Table 1.1. Figure 1.1 is a vicinity map for the Forest. Figures 1.2 through 1.5 are vicinity maps which show the locations of the recreation sites in the proposed action. All of the sites are currently operated and maintained by Forest Service staff and volunteers. The proposed action does not include any change in site rules or operation and maintenance standards and procedures.

Table 1.1. Mt. Hood National Forest developed recreation sites in Proposed Action

<i>Name of Site</i>	<i>Site Type</i>	<i>Location (Lat/Long)*</i>	<i>Ranger District</i>
Badger Lake	Campground	45.30496° / 121.55537°	Barlow
Bagby	Campground	44.95400° / 122.16900°	Clackamas River
Bagby Hot Springs	Day-Use	44.93500° / 122.17400°	Clackamas River
Barlow Creek	Campground	45.23600° / 121.62765°	Hood River
Barlow Crossing	Campground	45.21788° / 121.61291°	Hood River
Big Eddy	Day-Use	45.18200° / 122.17000°	Clackamas River
Black Lake	Campground	45.61800° / 121.76000°	Hood River
Bonney Crossing	Campground	45.25674° / 121.39205°	Barlow
Bonney Meadow	Campground	45.26548° / 121.58286°	Barlow
Camp Cody	Cabin Rental	45.22400° / 121.38200°	Barlow
Clackamas Lake Guard Stn.	Cabin Rental	45.09900° / 121.75100°	Zigzag
Clackamas Lake Compound	Cabin Rental	45.09900° / 121.75100°	Zigzag
Clear Creek Crossing	Campground	45.14641° / 121.58593°	Barlow
Cloud Cap Saddle	Campground	45.40247° / 121.65505°	Hood River
Eightmile	Campground	45.40625° / 121.45793°	Barlow
Forest Creek	Campground	45.17979° / 121.52461°	Barlow
Keeps Mill	Campground	45.15395° / 121.52040°	Barlow
Knebal Springs	Campground	45.43583° / 121.48022°	Barlow
Little Badger	Campground	45.28209° / 121.34802°	Barlow
Little John (Group Cmpgrd)	Campground	45.37100° / 121.56700°	Hood River
Lower Eightmile	Campground	45.41361° / 121.44371°	Barlow
McCubbins Gulch	Campground	45.11671° / 121.49380°	Barlow
Pebble Ford	Campground	45.40024° / 121.46362°	Barlow
Rainy Lake	Campground	45.62600° / 121.75883°	Hood River
Spring Drive (RV Cmpgrd)	Campground	45.11500° / 121.51900°	Barlow
Tilly Jane	Campground	45.39997° / 121.64772°	Hood River
Wahnum Lake	Campground	45.57731° / 121.79247°	Hood River
White River Station	Campground	45.19984° / 121.60107°	Barlow

* GPS Latitude/Longitude Coordinates are decimal/degree format (WGS-84 map datum)

Figure 1.1 Vicinity Map of the Mt. Hood National Forest

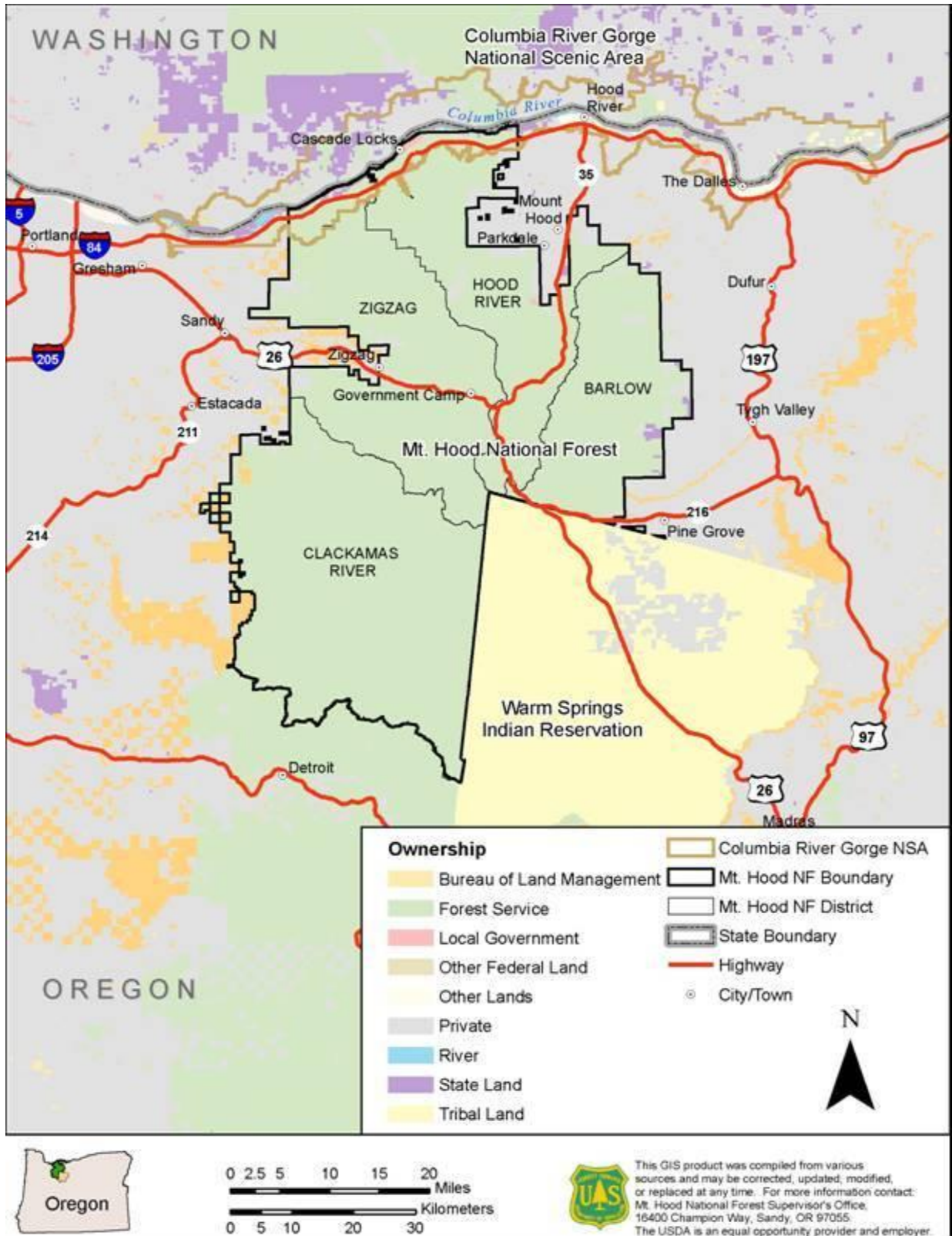
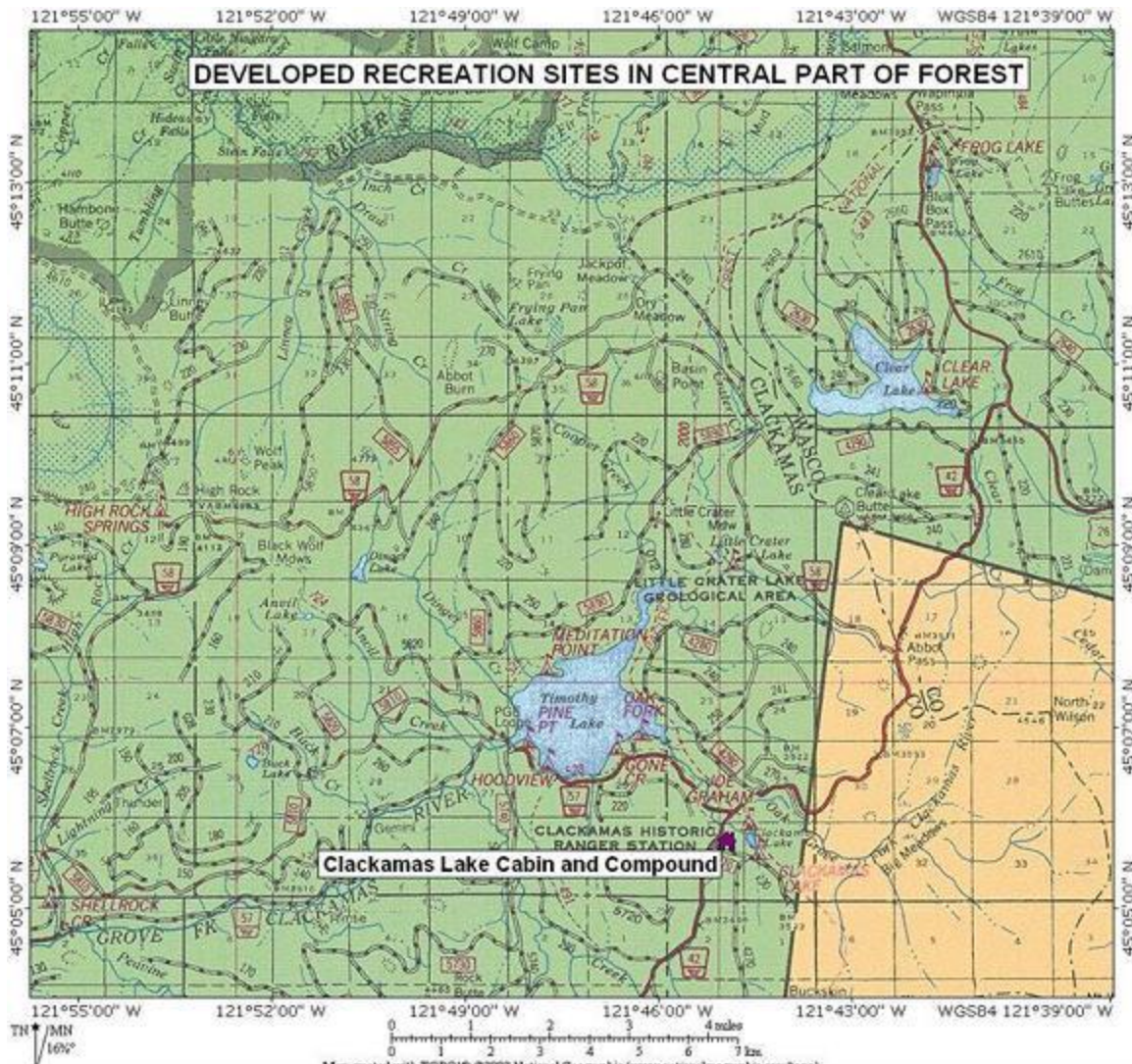


Figure 1.2 Developed Recreation sites in central part of Mt. Hood National Forest (managed by Zigzag Ranger District).



**Figure 1.3 Developed Recreation Sites along Clackamas and Collowash Rivers
(managed by Clackamas River Ranger District, Mt. Hood National Forest).**

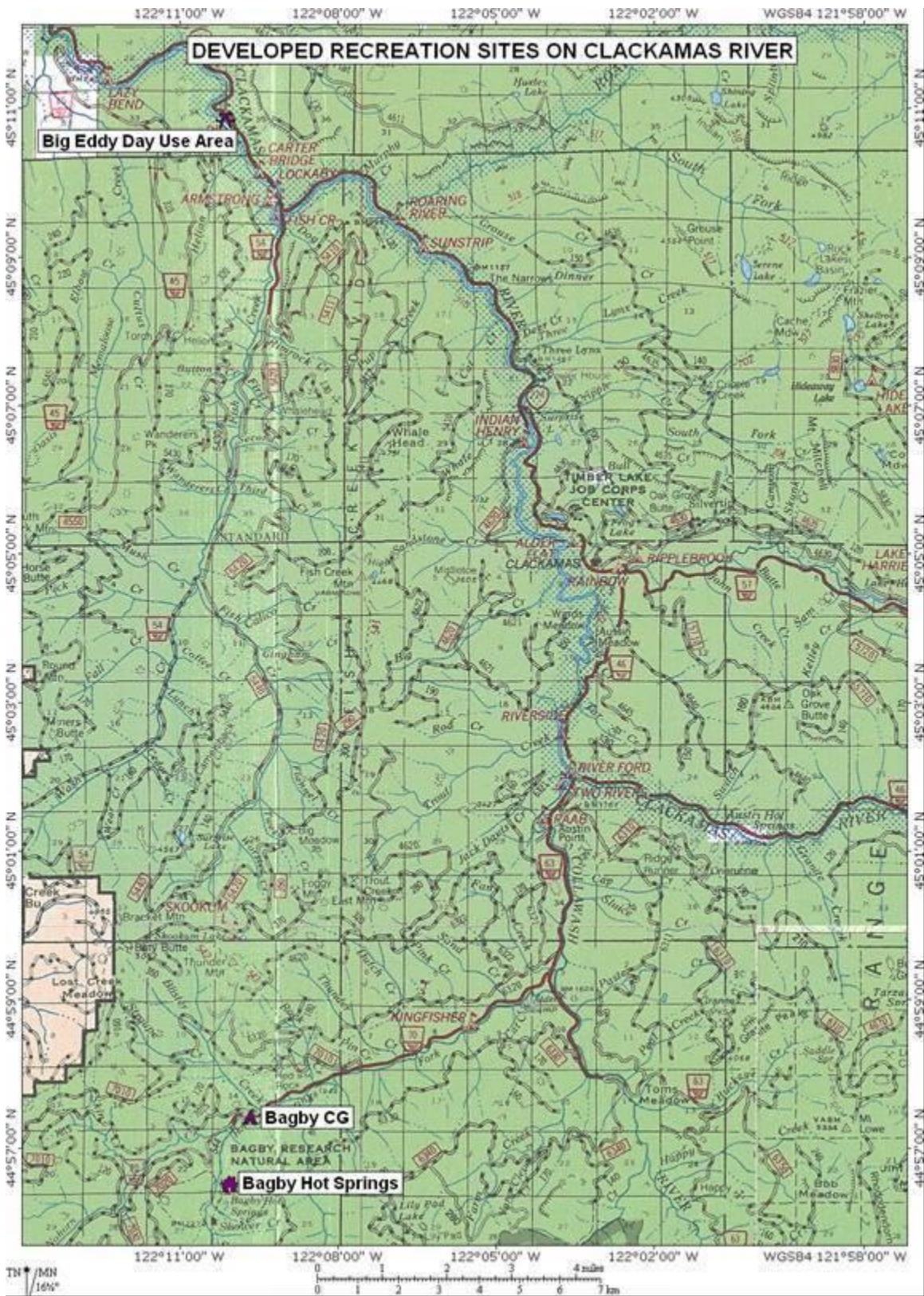


Figure 1.4 Developed Recreation Sites in SE corner of Mt. Hood National Forest (managed by Barlow and Hood River Ranger Districts).

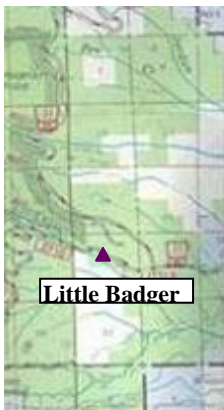
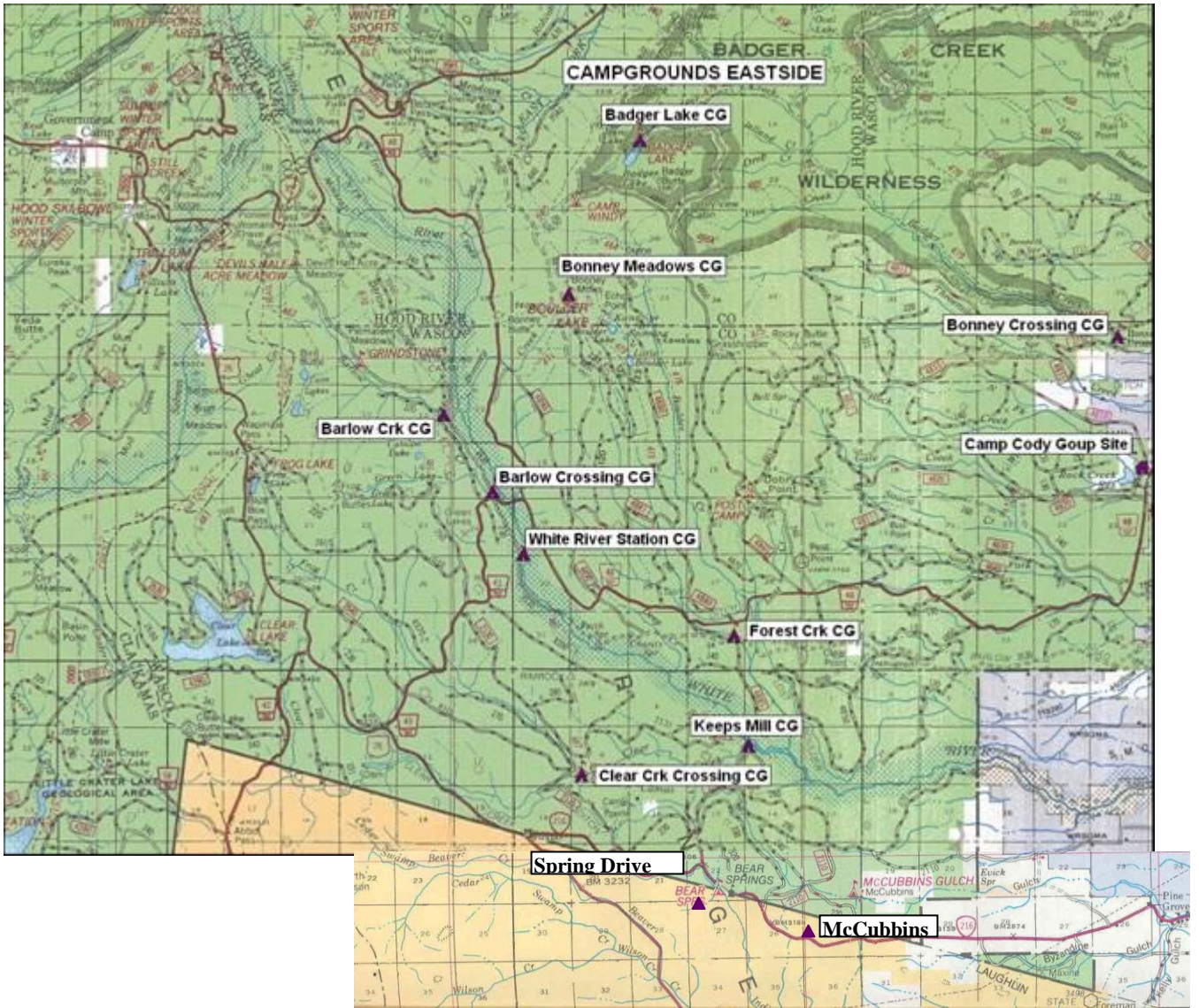
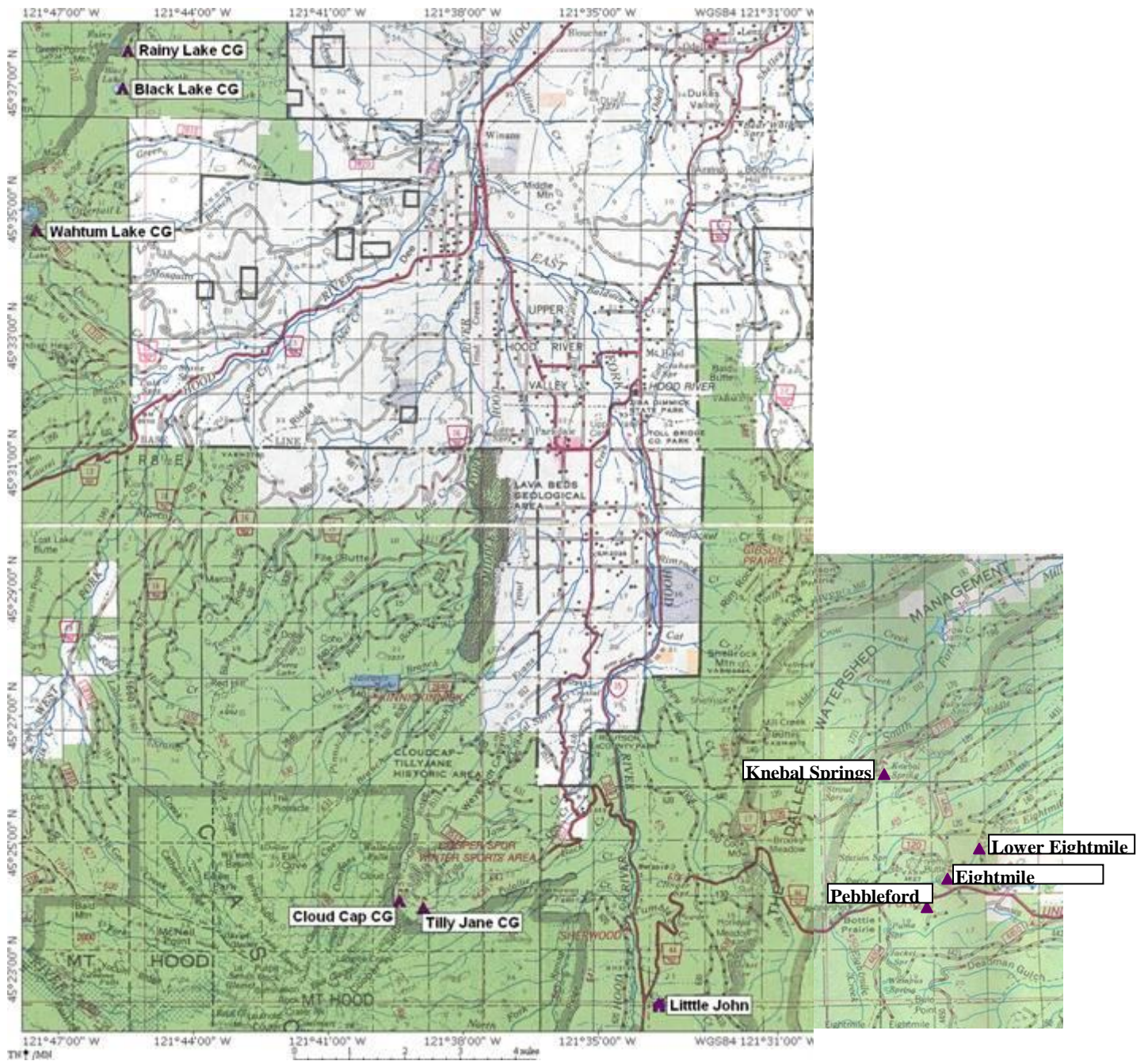


Figure 1.5 Developed Recreation Sites in NE corner of Mt. Hood National Forest (managed by Barlow and Hood River Ranger Districts).



This document includes an analysis of effects of operating and maintaining these recreation sites for the next ten year period. Two alternatives are considered in detail: No Action and the Proposed Action.

1.2 Document Structure

This Environmental Assessment is written to fulfill (in part) the requirements of the National Environmental Policy Act (NEPA), as well as to meet policy and procedural requirements of the USDA Forest Service. The intent of NEPA, its implementing regulations, and Forest Service policy is to inform the public, consider their comments, and to disclose the effects of actions which may affect the quality of the human environment. The document is organized into the follow parts:

Chapter 1: Purpose and Need for Action. This chapter includes background information about the project, the purpose of the project, the need for action, and the agency's proposal for achieving that purpose and need. This section also details how the Forest Service informed the public of the proposal and how the public responded.

Chapter 2: Alternatives, including the Proposed Action. This chapter provides a detailed description of the Proposed Action (Alternative B) as well as the No Action Alternative (Alternative A). The chapter includes design criteria that are part of the proposal.

Chapter 3: Environmental Consequences. This chapter describes the social and economic effects that would likely occur by implementing each of the two alternatives. The analysis is organized by resource topic.

Chapter 4: List of Preparers and References: This chapter lists the personnel involved in the preparation of the analysis and the reference materials used.

Appendix A: Response to Public Comments. This chapter lists the concerns raised by the public during the scoping and comment periods. Management responses to comments are provided; and there are also chapter references to citations in the EA.

Appendix B: Effects to Physical and Biological Environment. This chapter summarizes effects to plants, animals, soil and water for both the No Action and Proposed Action Alternatives.

Appendix C: Meaningful Measures Standards. This chapter describes the performance measures and standards for recreation facility operations. These standards are the benchmark for the organization nationwide.

Appendix D: Recreation Site Development Scale. This chapter shows the Forest Service build environment development scale spectrum.

Additional documentation, including more details of the developed sites may be found in the project planning record located at the Mt. Hood National Forest Headquarters Office

in Sandy, Oregon. The Deciding Officer, the Forest Supervisor for Mt. Hood National Forest, will use all of this information to make a decision.

1.3 Background

For more than 15 years, concessionaires have managed many Mt. Hood National Forest developed recreation sites with considerable success. The Forest began using concessionaires to manage many of its developed recreation sites in the 1990s based on direction in the Mt. Hood National Forest Land and Resources Management Plan, as amended (referred to as the Forest Plan). Specifically, the Forest Plan states the following on page Four-36 for its strategy for developed recreation:

“Based on a forest developed site priority study, sites which are little used or not economical to operate may be closed. Existing facilities are improved to a standard level, and a limited number of popular sites are to be expanded. All facilities are operated at standard service level and are expected to be physically maintained over the planning horizon.

During the past decade the Forest developed sites have been operating in a downward spiral. Maintenance has not kept up with the deterioration of facilities. In order to protect the public’s investment in the Forest developed sites, the Forest plans to complete the identified backlog of developed recreation rehabilitation needs in the first decade. Some new sites may be constructed towards the end of the decade. Any new sites should be coordinated with SCORP demand projections and coincide with the high and medium growth activities.

Developed campgrounds and other developed sites will continue to be offered for operation by concession. The potential to operate specific sites by concession shall be evaluated in terms of the costs and benefits to the Government. Contracting some essential services associated with developed site management, such as garbage collection and sewage disposal, shall continue.”

Section 7 of the Granger-Thye (G-T) Act of 1950 is the authority for issuing campground concession permits. The G-T Act authorizes the Forest Service to issue permits to individuals or entities for the use and occupancy of Government-owned structures and their associated lands. All or part of the permit fee may be offset by the cost of maintenance and reconditioning paid by the permit holder.

In response to the deterioration of developed recreation sites and Forest Plan direction, the Forest first issued concessionaire permits in the late 1990s for the operation of 52 sites. These sites are currently operating successfully under concessionaire permits. The sites are clean, well maintained with functional facilities and are operated in an efficient manner. Overall, visitor complaints are judged to be on par with similar facilities operated by Forest Service crews and volunteers (Recreation Program Manager’s personal observation from experience working at three different National Forests over the past 24 years). Notwithstanding research that reveals a preference for public operation of

public campgrounds (Kerstetter, et al, 2010), anecdotal evidence shows that the public is equally satisfied with the results of concession operations. The concessionaires are responsible for cleaning and maintaining facilities, managing the reservation system, collecting fees, providing information to campers, and enforcing rules. The Forest Service is responsible for administering concession operations. Concession permit fees owed to the government are used to replace aging and worn-out infrastructure and to improve the sites (fee offset authorized by the Granger-Thye Act of 1950).

Concessionaires are selected through a competitive process. Concessionaires bid on a prospectus and are selected based on five criteria: proposed operating plans; business plans, business experience and references; fee to the Government; fees charged to the public; and ability to implement Granger-Thye fee offset projects. Successful bidders customarily receive special use permits for a five-year term; and that term can be extended non-competitively for an additional five-year period.

The Forest Service recreation budget appropriated annually by Congress declined substantially in 2004 (see Table 1.2), and it has been generally flat for the past 8 years. It has become increasingly difficult to operate and maintain the remaining developed sites on the Forest (those not currently under concession management) using past practices. All of these sites are popular with the recreating public. Most were originally developed because the scenic environment (especially water features) attracts people to the sites. However, their remoteness and small size present management challenges, especially high operation and maintenance costs.

Table 1.2. Congressionally appropriated recreation budgets (Budget Object Code NFRW) by fiscal year (Oct. 1 – Sept. 30) from 2003 through 2012. *National budget is net \$ available to National Forest System. **FY12 is initial program direction.

Year	National Recreation Budget*	Mt. Hood NF Recreation Budget
2003	\$222,726,000	\$1,628,300
2004	\$149,321,000	\$1,226,371
2005	\$145,885,000	\$1,148,591
2006	\$169,067,000	\$1,317,680
2007	\$150,297,000	\$1,176,000
2008	\$153,977,000	\$1,285,318
2009	\$172,664,000	\$1,520,000
2010	\$173,010,000	\$1,591,251
2011	\$164,213,000	\$1,476,600
2012	Not Available	\$1,296,000**

In 2007, the Forest conducted a recreation facility analysis (RFA) to assist the Forest in making strategic decisions about how and where to focus recreation management resources. All of the Forest’s developed recreation sites were evaluated and ranked based on conformance to the Forest’s recreation niche and amount of recreation use, financial efficiency, and environmental and community sustainability. One result of the process

was a recommendation that all sites currently under concessionaire operations would remain so. The RFA also led to the recommendation that most of the remaining developed recreation sites be managed in some other way (other than customary Forest Service operation and maintenance) or be closed due to low use, high operating costs, and/or extensive deferred maintenance. For a majority of the sites, it was recommended that there be a change to concession, partner, or volunteer operation. Table 1.3 shows the recommended management changes for the developed recreation sites in this analysis.

The RFA led to recommendations that some developed recreation sites be managed through partner agreements or by volunteers (see Table 1.3). In 2008, the Forest attempted to enlist partners and to recruit volunteer hosts for these sites. Some of the sites were advertised in *Workamper News* as a way of recruiting volunteers. Offers were made to Oregon's equestrian organizations to help manage the equestrian campgrounds (Bonnie Crossing and Knebal Springs). These efforts did not result in any long-term partnerships with individual or organizational volunteers.

The RFA also led to recommendations that a few sites be closed (remove facilities and change site type) or decommissioned (see Table 1.3). The Forest considers this recommendation to be an action of last resort. As previously stated, the sites were originally developed because the scenic environment attracts people to the sites.

Removing facilities and managing the sites as part of the general forest does not change the fact that people will continue to be attracted in high numbers to use the sites. High levels of public use at undeveloped sites present other management challenges (untreated human waste, accumulation of litter, accelerated erosion and loss of vegetation). The Forest is including these sites in the proposed action to protect the environment and to continue offering facilities where people congregate.

Three of the sites proposed for concession management (Clackamas Lake Compound, Camp Cody, and Spring Drive) have not been managed for public recreation use in the past. They are administrative sites that are no longer needed for National Forest administrative purposes. They are included in the proposed action because they would help fill a niche in the spectrum of developed recreation sites offered by Mt. Hood National Forest. A fourth site, Little John, is managed as an Oregon State Snopark during winter. It is under-utilized during the summer; and managing it as a group campground would also help fill a gap in the Forest's portfolio of developed sites.

1.4 Desired Conditions

The following statements from the Mt. Hood National Forest Land and Resource Management Plan (LRMP) represent the desired condition for development recreation:

“Provide a broad range of year-round, high quality developed recreation opportunities.”
(LRMP, pg. Four-4)

Table 1.3. Past (traditional) and RFA (recommended) management of Mt. Hood National Forest developed recreation sites in this analysis. The 2007 Recreation Facility Analysis (RFA) 5-Year Action Plan includes recommended future management regimes for all National Forest developed recreation sites. Recreation Facility Analysis, 5-Year Program of Work, Mt. Hood NF, July 3, 2008, pp 16-25.

<i>Name of Site</i>	<i>Site Type</i>	<i>Past Management</i>	<i>RFA Management*</i>
Badger Lake	Campground	FS Recreation	F8, H3
Bagby	Campground	FS Recreation	C1, F8, G1, H1
Bagby Hot Springs	Day-Use	FS Recreation	H1
Barlow Creek	Campground	FS Recreation	C2, H2
Barlow Crossing	Campground	FS Recreation	C2, H2
Big Eddy	Day-Use	FS Recreation	A1
Black Lake	Campground	FS Recreation	D3, D4, E6, K1, K2
Bonney Crossing	Campground	FS Recreation	C2, H2
Bonney Meadow	Campground	FS Recreation	C2, H2
Camp Cody	Cabin Rental	Administrative Site	N.A.
Clackamas Lake Guard Stn.	Cabin Rental	FS Recreation	C1, I4
Clackamas Lake Compound	Cabin Rental	Administrative Site	N.A.
Clear Creek Crossing	Campground	FS Recreation	C2, H2
Cloud Cap Saddle	Campground	FS Recreation	C2, H2
Eightmile	Campground	FS Recreation	C2, H1
Fish Creek Trailhead	Day-Use	FS Recreation	H2, I5
Forest Creek	Campground	FS Recreation	C2, H2
Keeps Mill	Campground	FS Recreation	C2
Knebal Springs	Campground	FS Recreation	F16
Little Badger	Campground	FS Recreation	C2
Little John (Group Cmpgrd)	Campground	State Snopark	N.A.
Lower Eightmile	Campground	FS Recreation	D3, D4, E6, K1, K2
McCubbins Gulch	Campground	FS Recreation	C2, H2
Pebble Ford	Campground	FS Recreation	C2, D3, D4, E6, K1, K2
Rainy Lake	Campground	FS Recreation	D3, D4, E6, K1, K2
Spring Drive (RV Cmpgrd)	Campground	Administrative Site	N.A.
Tilly Jane	Campground	FS Recreation	NC1
Wahtum Lake	Campground	FS Recreation	NC1
White River Station	Campground	FS Recreation	C2, H2

*** Key to RFA Management Codes:**

- | | |
|---|--|
| A1 – Decommission | H3 – Volunteer (increase use of volunteers at the site) |
| C1 – Increase Season of Operation | I4 – Increase Current Fee |
| C2 – Reduce Season of Operation | I5 – Increase Fee Compliance Efforts |
| D3 – Remove Restroom Facility | K1 – Change in Development Scale |
| D4 – Remove Tables and Grills | K2 – Change in Site Type |
| E6 – Reduce Service | NC1 – No Change – currently USFS operated |
| F8 – Add a Host Site(s) | N.A. – Not Applicable (not included in Recreation Facility Analysis) |
| F16 – Improve Access for Horse Trailers | |
| G1 – Construct a New Site | |
| H1 – Change to a Concession Operation | |

“Recreation in the Forest 50 years from now will depend to a significant extent on sites privately developed and operated. As demands for winter sports, organizational activities and overall developed recreation opportunities increase, they will be met by concessionaire or permittees.” (LRMP, pg. Four-10)

1.5 Purpose and Need for Action

One purpose of the proposal is to keep these 28 developed sites open for public use and enjoyment, and to provide safe, clean, affordable, functional facilities. Another purpose is operate the sites in a more cost efficient manner. As already stated in Section 1.3 of this document, the Forest’s larger, more efficient campgrounds were put under concession management in the late 1990’s. This concession package has operated efficiently and effectively, benefiting from economies of scale.

Upon completing the Recreation Facility Analysis (RFA), the Forest concluded that all of the sites (except Big Eddy Day-Use Area) are “Category B” sites. Category B sites meet the unit niche; are environmentally sustainable within the capability and capacity of the natural resources; are supported by and provide support to local communities; and have a sustainable management cost-benefit ratio (RFA, p. 2). Therefore, they are a priority to keep open. They are also the least efficient sites to operate because they are small and remote. Therefore, action is needed to implement a more financially efficient business model to operate and maintain the sites.

Big Eddy Day-Use Area is a Category D site in the RFA. Category D sites do not meet all of the criteria described above (Category B); or fall sufficiently short in one or more of the criterion rendering it unsustainable (RFA, p. 2). Because of its desirable location, the Forest would prefer to keep the site open to the public. However, there is a need to manage Big Eddy with a more financially efficient business model with greater economies of scale.

1.6 Proposed Action

In response to the need for action discribed in Section 1.5, the proposed action involves bundling the sites listed in Table 1.1 with the other developed sites that have been concession-managed for 15+ years and issuing a special use permit(s) for concession operation and maintenance of all the sites. The term of the permit(s) would be for five years with an option to extend the permit(s) another five years non-competitively if the permittee operates at a sustained satisfactory level.

The concessionaire(s) would be responsible for hiring, training and supervising an adequate number of paid campground hosts to collect fees, provide camper information, clean and maintain facilities, and gain compliance with campground rules and regulations with a “Good Host” approach. The concessionaire(s) would be responsible for hiring a maintenance staff, provide them with vehicles, tools and materials. A complete list of maintenance requirements for developed recreation sites appears in the campground concession prospectus. The concessionaire would be responsible for managing campground reservations through the National Recreation Reservation System (NRRS).

The concessionaire(s) would be required to pay the U.S. Government a percentage of gross receipts. Under Granger-Thye Act (G-T) fee offset authority, these funds could be used to perform “landlord maintenance” and replace worn out facilities such as toilets, tables, fire rings, water systems, and other infrastructure and improvements. Ground disturbing activities in this action would be limited to routine replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads. These activities are the same as would be performed by Forest Service staff or volunteers. More substantial ground disturbing activities that may be needed for future management would be analyzed separately as the projects are planned.

Concessionaire Special Use Permit(s) would be monitored by a Forest Service permit administrator for compliance with the Annual Operating Plan(s) and permit terms. Examples of an operating plan and the standard concessionaire permit are available for review in the Project File at the Headquarters Office in Sandy, Oregon.

The proposed action is an administrative change that does not involve construction of new facilities or infrastructure or any substantial ground disturbing activities other than the routine activities described above. All of the sites currently exist, and management would continue with existing policies and regulations. Site improvements would be authorized with separate NEPA analysis.

1.7 Decision Framework

The Responsible Official for this project is the Forest Supervisor for Mt. Hood National Forest. Based on this analysis, and considering the public comments received during scoping and the public comment period, the Responsible Official will decide whether or not:

- To issue a concessionaire special use permit(s) as proposed;
- To select and modify an alternative; or
- To take “No Action” at this time and continue to manage these 28 developed sites with Forest Service staff and volunteers.

1.8 Management Direction

The Proposed Action has been designed to meet the goals and objectives of the documents listed below. This analysis is tiered to the Environmental Impact Statements listed below, which are incorporated by reference:

- The *Mt. Hood National Forest Land and Resource Management Plan Record of Decision and Final Environmental Impact Statement* as amended (referred to as the Forest Plan) (USDA Forest Service 1990). The Forest Plan contains standards and guidelines applicable to this project. Consistency will be addressed in each resource section.
- The Forest Plan was amended by the *Record of Decision and Final Supplemental Environmental Impact Statement and Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl* (referred to as the Northwest Forest Plan or NWFP) (USDA & USDI

1994). The NWFP contains standards and guidelines for Matrix, Riparian Reserves and Late-Successional Reserves. Consistency will be addressed in each resource section.

- The Forest Plan was also amended by the Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (USDA and USDI, 2001). Because this project proposes no ground-disturbing activities, it is exempt from the provisions of survey and manage.
- The Final Environmental Impact Statement for Site-Specific Invasive Plant Treatments for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon, including Forest Plan Amendment #16. (USDA Forest Service 2008)

1.9 Public Involvement

The proposal was initially listed in the spring, 2010 (issued April 1, 2010) in the Schedule of Proposed Actions (SOPA), posted on the Forest website at

<http://www.fs.fed.us/sopa/forest-level.php?110606>

The proposal was also included in the summer (July 1, 2010), fall (October 1, 2010) and winter (January 1, 2011) editions of the SOPA.

In January, 2011, a Preliminary Assessment was issued, and the public was invited to comment for a 30-day period. A public open house was held at the Mt. Hood National Forest Headquarters Office on Tuesday, January 18, 2011 to discuss the project. Letters and emails received during the 30-day notice and comment period were analyzed, and responses to substantive comments are found in Appendix A of this document.

1.10 Issues

The Forest received seventy letters and emails containing one hundred and thirty-one comments. All were considered in preparing this analysis. Nearly all of the comments concerned Bagby Hot Springs. All of the concerns were social or economic in nature. None pertained directly to the biological or physical environment.

None of the concerns are substantive issues in the context of Council on Environmental Quality (CEQ) regulations promulgated under the NEPA, that is issues that are irresolvable without changing the proposed action. They express strongly held personal values, attitudes, or beliefs and are clearly heartfelt. Sections 1.10.1 through 1.10.7 summarize the concerns. Appendix A lists all of the comments and management responses.

1.10.1 Concession Management of Bagby Hot Springs May Result in Increased Enforcement of Existing Use Restrictions.

Some people come to Bagby Hot Springs specifically for nude soaking. For some, use of intoxicants is part of the Bagby experience. The opportunity to use the tubs after dark is a third element that traditional Bagby users cherish. All three of these practices have long been associated with Bagby Hot Springs, and all three are management challenges. Many concerns

were expressed that the proposed action would interfere with these traditional practices.

Forest Order MH-215-20-92 prohibits public nudity at developed recreation sites in Mt. Hood National Forest (36 CFR 261.58(j)). The Order was written in 1992, and it applies to Bagby Hot Springs. Possessing an alcoholic beverage at or near Bagby Hot Springs has been prohibited since 2002 by Forest Order MH-283-05-2002 (36 CFR 261.58 (bb)). Since these orders were written, public nudity and alcohol possession have been managed largely without controversy. Although Bagby Hot Springs is a “day-use site,” use after dark is permitted so long as occupancy is temporary (less than 24 hours) without intent to camp.

Security at Bagby Hot Springs is complicated by the remoteness of the site, the use of intoxicants, and the popularity of the site at night. When management presence is reduced, car clouting (smashing windows to steal personal property) at the trailhead is a problem. Other problems that have been reported are drunk and disorderly conduct, assault, and illegal use of firearms. When law enforcement presence has been increased as it was in 2003-2004, unlawful behavior has diminished. The ban on alcohol at Bagby has had a positive effect. It is not known if the imposition of a user fee at the Bagby Trailhead has affected security, however Grewell (2002) documents that fees in the National Parks have been linked to a reduction in littering, vandalism, and criminal activity. The public also generally believes this is true (Bengston and Fan, 2000).

Neither concession employees, Forest Service volunteers, nor non-profit personnel have the law enforcement authority vested in federal employees. Under both the Proposed Action and No Action Alternatives, Forest Service law enforcement would be “on call,” but would not be present in the campgrounds on a day-to-day basis doing operation and maintenance work.

Occupancy rules would continue to be enforced, consistent with agency policy; and a proposal to change occupancy rules is not part of the purpose and need for action, nor is it part of the proposed action. Therefore, this concern is not a substantive issue as defined under NEPA.

1.10.2 Concession Management of Bagby Hot Springs (and Other Campgrounds) May Increase Commercialization of the Site Thereby Negatively Affecting its Historic Character and Traditional Uses.

This concern includes comments from many people who are concerned about the prospect of Bagby Hot Springs being managed by a for-profit enterprise. Paraphrasing the comments, many people are concerned that the unique essence, tradition, and history of Bagby would be “ruined” or lost through concession operation. Many people want Bagby to remain just as it is – inexpensive, rustic, and cared for by its users. At its heart, this concern expresses the desire of many to have an unconfined recreation experience, unfettered by fees or rule enforcement.

The Forest Plan presents an apparent management paradox for Bagby Hot Springs. On the one hand, the 854-acre area around the hot springs is classified a Special Interest Area (management area A4, LMP page Four-151) and is designated as semi-primitive, non-motorized (SPNM) on the Recreation Opportunity Spectrum (ROS). A SPNM designation signifies a natural setting with only subtle modifications. Onsite management presence in SPNM is usually minimal. The

Forest Plan notes that solitude, inspiration, and a sense of kinship and sharing with individuals who hold similar values are desired sensory perceptions for all of the Forest's special interest areas. Based on public comments, this description fits the experience that is sought by many who visit Bagby Hot Springs.

The developed hot spring site is actually management area A10, Developed Recreation Sites embedded within the Bagby Hot Springs Special Interest Area (A4). The bathhouses and tubs at Bagby are clearly not subtle intrusions on an otherwise naturally appearing environment, but they are consistent with standard A4-002 ("Recreation facilities may occur." LMP page Four-153). Standard A10-004 states that, "occupancy and use of developed recreation sites shall be regulated to the extent necessary to protect resources and facilities and to ensure the safety and enjoyment of recreating Forest visitors" (LMP page Four-187). Such regulation includes the full suite of options used at other developed recreation sites in the forest including concession management.

Under current Forest Plan direction, the unconfined recreation experience and unfettered access desired by many people may be appropriate for most of the Bagby Hot Springs Special Interest Area, away from the actual hot springs. It is not consistent, however, and should not be expected at the developed Bagby Hot Springs recreation site. The recent lack of robust Forest Service management has manifested in popular and traditional public uses that are inconsistent with the Forest Plan standards. The proposed action would increase management presence with the intent to better protect resources and facilities and to promote safety and enjoyment for all visitors.

Concession management was labeled "privatization" by many respondents who used the term in a pejorative way. Even some respondents who strongly object to the idea of concession management conceded that management by a non-profit would be acceptable. They believe that, without a profit motive, such an enterprise would be more sensitive to preserving the historic character and traditional uses that make Bagby special for many users. Some comments lauded recent involvement by Northwest Forest Conservancy and Friends of Bagby. For several years, Northwest Forest Conservancy, a non-profit group, had a permit from Mt. Hood National Forest to restore the historic cabin at the hot springs site. The group was never directly responsible for day-to-day operations and maintenance of the tubs, outhouse, or other facilities. Friends of Bagby, on the other hand, was directly involved in operations and maintenance for many years until the group disbanded about 10 years ago and its Forest Service permit was not renewed.

A few respondents suggested that the Forest Service should simply issue a permit for Bagby management to Northwest Forest Conservancy. Forest Service Policy requires that concession operation of Government-owned improvements be awarded on a competitive basis through a prospectus and invitation to bid process (Forest Service Manual, Chapter 2344.03). Non-profit enterprises are entitled to compete for concession permits. Therefore, this suggestion is addressed by the Proposed Action, so no new alternative was developed. Also, the Forest Service cannot limit a competitively-offered concession prospectus to only non-profit enterprises. This matter is discussed further in Section 2.3.1.

Concerns, such as the following, were expressed about management of some of the other rustic campgrounds in the Proposed Action:

“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 [preliminary analysis] fails to consider the impacts of increased management presence at these campgrounds.” (Comment Letter #10, Comment #18)

The rustic campgrounds in the Proposed Action are in Management Area A10, Developed Recreation Sites, in the Forest Plan. Standard A10-004 states that, “occupancy and use of developed recreation sites shall be regulated to the extent necessary to protect resources and facilities and to ensure the safety and enjoyment of recreating Forest visitors” (LMP page Four-187). These rustic campgrounds have facilities precisely because they are located where people have traditionally gathered. The facilities were built to protect the environment and to provide for the enjoyment of the recreating public. The facilities are government investments that needs to be protected. It is appropriate that protection includes the full suite of options used at other developed recreation sites in the forest including concession management.

One way to resolve the concerns discussed in this section would be to alter the development scale of Bagby Hot Springs and other campgrounds included in the project. The current development scale at the sites is Level 3 and 4 as described in the Forest Service Manual (Forest Service Manual, Chapter 2330.3) and they are managed according to the standards in management area A10, Developed Recreation Sites (LRMP pp. Four-186 through Four-189). An unconfined recreation experience is more consistent with sites with development scale 1 and 2 which are managed according to the standards in management area A5, Unroaded Recreation (LRMP pp. Four-157 through Four-162) or area A6, Semi-Primitive Roaded Recreation (LRMP pp. Four-163 through Four-167). A major characteristic of both of those areas is minimal on-site controls and restrictions. Reducing the development scale would involve removing many, if not all, of the facilities and improvements (outhouses, tables, firerings). Such changes are outside the scope of this project. Therefore, the concerns summarized in this section do not constitute a substantive issue as defined by NEPA.

1.10.3 A Lack of Administrative Oversight May Result in a Concessionaire Charging Excessive User Fees Resulting in a Loss of Public Access.

Many comments were received which expressed a concern about unregulated and runaway user fees at concession operated sites. Steep user fees, it is felt, prevent people without financial means from using the sites. It is feared that the Forest Service will be either unwilling or unable to contain fees.

The fear that private interests will place public lands out of the reach of low-income Americans is as old as the National Forest System itself (Quinn, 2002). During the first half of the 20th century, the prevailing sentiment was that operating public parks was a public function. Several terms, such as “primary goods” or “merit goods” have been used by those who believe that providing public recreation services is a necessary function of government (Kirshenbaum, 2006; More and Manning, 2004). For at least the past 30 years, neo-conservative ideology (More and Manning, 2004) has espoused a doctrine of market-based efficiency. Grewell (2002) supports

this position arguing that user fees should be determined by the market to discourage so called “welfare recreation” and its negative social and environmental effects.

The determination of appropriate prices for public land recreation has always been about balancing economic efficiency (generating revenue) and social equality (maintaining access for all) (Kyle, et.al., 2002). Studies show that the public (at all income levels) overwhelmingly supports fees or a combination of fees and taxes as a means to pay for recreation services on public lands (Bowker, et.al, 1999; Burns and Graefe, 2006). Burns and Graefe (2006) found broad acceptance for charging fees for hot springs use on National Forest lands. In fact, acceptance was highest (though not statistically significantly higher) among the lowest income group (those earning less than \$10,000 per year). For the time being, Congress has settled the matter of user fees with the passage of the 2005 Federal Lands Recreation Enhancement Act (REA). REA authorizes federal land management agencies to charge user fees at sites that meet specific criteria. The sites in this project all meet the fee requirements under REA. Faced with insufficient appropriated funds for management, the Forest has used REA fee authority to help generate operation and maintenance funds. The result is that recreation services in Mt. Hood National Forest are funded by a combination of fees and taxes.

Congressional appropriations to federal agencies responsible for managing public-land recreation areas have not kept pace with demands (Quinn, 2002, and Table 1.2 in this EA). Managers have increasingly turned to private concessions to operate public recreation sites (More and Mannin, 2004). Quinn (2002) argues that any concession arrangement (whether to a profit or non-profit enterprise) should be managed using a public utility model, meaning that the public land agency has a responsibility for regulating prices in what is essentially a protected monopoly. By managing a concession enterprise under a public utility model, the Forest Service can ensure equitable access. The principle concessionaire for the past 12 years in Mt. Hood National Forest requested camping fee increases of \$1.00/site/night at roughly two year intervals. The Forest approved the requests with the exception of the last fee increase request that coincided with the depth of the most recent world-wide economic recession. Camping fee increases averaged three percent per year which has generally been on par with overall inflation in the US.

The concern discussed in this section is speculative and does not constitute a substantive issue as defined by NEPA.

1.10.4 Concession Management of the 28 Developed Sites Would Be an Abdication of Public Agency Responsibility and May Result in a Loss of Management Expertise by Forest Service Personnel.

Many comments expressed a preference for direct Forest Service operation and maintenance of its campgrounds and other developed recreation sites. Some fear that the Forest Service will no longer have skilled technicians able to do the job in the future. Others question whether the Forest Service is even interested in recreation management.

These comments are consistent with research showing preference for public operation of public campgrounds (Kerstetter, et.al, 2010). Reasons cited for this preference include (1) employee knowledge of and ability to control services and amenities; (2) avoidance of over-

commercialization; and (3) fulfillment of the expected role of public stewards. Samnaliev, et.al (2004) found that only 28.8% of the American public supports contracting with private companies to manage public recreation lands.

Regardless of the management model adopted as a result of this decision, the amount of time that the public would see and interact with Forest Service employees would be roughly equivalent. Under the concession model, the concessionaire's employees would become the public face of management. Under the public management model, volunteer hosts would generally be the agency's public face. Often Forest Service volunteers are the same people hired by the concessionaire; they are drawn from the same pool (mostly retirees). In either model, Forest Service employees would play a supporting role with regard to day-to-day interaction with the public.

Part of this public concern is a lament that the Forest Service would lose an opportunity to inform the public about important policies such as new travel management rules (i.e. at McCubbins Gulch campground). Campground operation, maintenance, and public information are distinct management functions. Implementing any site's specific policy differences need not be the overriding criterion in deciding about who does basic operation and maintenance. The McCubbins Gulch OHV route system does demand extra effort on the part of the government to implement the new travel management policy. Mt. Hood National Forest has a new position to do that work. This action is separate from the decision about operation and maintenance at McCubbins Gulch Campground.

Public sentiment notwithstanding, the intent of Mt. Hood National Forest to operate and maintain recreation sites through concession permits was vetted with the public at the time of Land Management Plan adoption. The direction is documented in the plan (LMP, page Four-36). The Forest has practical experience managing concession permits for more than 15 years while maintaining expertise in campground operation and maintenance. In the context of the National Environmental Policy Act (NEPA), the concerns discussed in this section are not valid and do not rise to the level of a substantive issue.

1.10.5 The Economic Assumptions Underpinning the Proposed Action Are Flawed Leading to a False Conclusion That Concession Management Would Be More Financially Effective.

Several comments challenged the economic assumptions underlying the Proposed Action. Specifically, if a concessionaire can profitably operate these 28 developed recreation sites, then why can the Forest Service (which does not need to operate profitably) not operate them? Similarly, another comment challenged the notion that a concessionaire would be able to provide a higher level of service in the campgrounds if the Forest Service is not able to do so.

During the 1990's, the Forest Service adopted a set of management standards for developed recreation sites. These standards are called "meaningful measures," and these measures are the benchmark for excellent service to the public. These standards are usually met in large, high-development level campgrounds which have full-time hosts. In small, remote campgrounds, it is difficult to meet meaningful measure standards under any management model. The intent of the

proposed action is not to find a panacea which can meet economically unattainable performance standards, but to provide the best possible service to the public under the circumstances.

This concern was not used to create a new action alternative because a new alternative is not necessary to resolve the concern. However, it serves as a point of comparison between the alternatives. The economic efficiency of concession and Forest Service management is tracked in this analysis for each of the alternatives. The measure of economic efficiency is net return to the government.

1.10.6 Philosophical Objection to Concession Management of Public Recreation Sites.

Comments included many philosophical objections to concession management of public recreation sites. Among them were the following:

1. Private companies should not make a profit from public lands and public facilities.
2. Concessionaires do not have the public interest at heart, and are not accountable to the public;
3. Concessionaires lack the knowledge and skill to manage public recreation sites, especially a developed hot spring;
4. Concessionaires impose their own rules which may be confusing to the public.

However, these comments are personal opinions about concession management of public recreation sites. In fact, many of these alleged shortcomings are contractual requirements of the permit, and they are within the control of the Forest Service. For the purposes of this analysis, it is assumed that: (1) a concessionaire would be selected with adequate knowledge and skills; (2) there would be no deviation from current site rules; and (3) Mt. Hood National Forest would properly administer the special use permit.

Although these beliefs are strongly held, they are speculative and do not offer a site specific cause-effect relationship necessary to be evaluated as substantive issues under NEPA in this analysis. Whether or not the Forest Service should ever utilize concessionaires to manage recreation sites is settled by agency policy (Forest Service Manual, Chapter 2344.03) and Forest Plan direction (LRMP, p. Four-36), so the issue is outside the scope of this analysis.

1.10.7 Underlying Assumptions in the Preliminary Analysis Are Flawed.

A few comments challenged assumptions (in addition to economic assumptions) contained in the Preliminary Analysis (PA). Examples of challenged assumptions are:

- The Mt. Hood National Forest allows concessionaires to charge more for a campground than it would charge if it managed the same campground;
- None of the fees charged by a concessionaire are returned to the government;
- The age of the Forest Plan renders it obsolete with regard to direction to operate and maintain campgrounds using concessionaires;
- The proposed action is inconsistent with the finding in the 2007 Recreation Facility

Analysis;

- Once these campgrounds get handed over to concessionaires, they are essentially in the hands of private entities permanently.

The underlying assumptions in the PA can be substantiated, and further explanation is provided in this document. Each of the comments that challenged assumptions has a response in Appendix A.

CHAPTER 2 – ALTERNATIVES

2.1 Alternatives

This chapter includes a description of the range of reasonable alternatives developed to respond to the need for actions described in Chapter 1. Two alternatives, No Action and the Proposed Action are detailed and compared to clearly distinguish alternatives for both the decision-maker and the public. Also described in this chapter are other alternatives considered but dropped from further study and the design criteria that would be implemented to minimize or prevent adverse effects.

2.1.1 Alternative A: No Action

In the No Action Alternative, the Forest would initially continue to manage the 25 existing developed recreation sites described in Table 1.2 through a combination of Forest Service staff and volunteers. Fees would continue to be charged under the authority of the Federal Lands Recreation Enhancement Act (REA) also known as the “Recreation Fee” program that allows the Forest to keep 95% of the fees collected to cover operation and maintenance costs. With No Action, campground fees would initially be \$10 per night per site as they have been since 2004. Any new fees or increase in fees would need to be reviewed by the Pacific Northwest Recreation Resource Advisory Committee, and their recommendations would be submitted to the Regional Forester for concurrence.

With No Action, ground disturbing activities would be routine repair and maintenance of recreation sites and facilities such as replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads.

The three administrative sites (Clackamas Lake Compound, Camp Cody, and Spring Drive) would not be available to the public as developed recreation sites. Little John Snopark would continue to be available to the public in the summer as a dispersed recreation site with no fee.

In light of the constrained federal fiscal environment, it is highly likely that some of these sites would be decommissioned following recommendations in the Recreation Facility Analysis (previously discussed in Section 1.3 of this document). Effects of site decommissioning would be analyzed as a separate planning effort.

2.1.2 Alternative B: Proposed Action

Alternative B is the Proposed Action, as described in Chapter 1. In this alternative, a term special use permit(s) would be issued to a concessionaire(s) for operation and maintenance of the 28 developed recreation sites listed in Table 1.1. The term for a concession permit is customarily five years with the option to non-competitively renew for five additional years if the permit holder has sustained satisfactory performance.

The 25 developed sites that have previously been available to the public would continue to be

available in the same manner (either first-come, first-served or reservation). The facilities at Clackamas Lake Compound and Camp Cody would be available to the public as recreation lodging rentals. Spring Drive would be offered as an RV campground with hookups. Little John would be rented during the summer season as a group camp.

The concessionaire(s) would operate under the authority of the Granger-Thye Act of 1950 which allows the concessionaire to charge use fees, and to offset the payment due to the government by performing landlord maintenance and improvements to the sites. The amount of the concession fee would be determined through a competitive bid process and would be one of the criterion used to evaluate and select a concessionaire. The other evaluation criteria would be: proposed operating plans; business plans, business experience and references; fees charged to the public; and ability to implement Granger-Thye fee offset projects.

The concessionaire(s) would manage the sites under existing rules and regulations subject to change through proper administrative procedures. Concessionaire(s) would be primarily responsible for enforcing occupancy rules except that they would not have law-enforcement authority vested in state or federal Law Enforcement Officers.

As in the No Action alternative, ground disturbing activities would be routine repair and maintenance of recreation sites and facilities such as replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads.

2.2 Project Design Criteria and Best Management Practices for all Alternatives

These practices are part of each alternative. The effects of these practices are included in the analyses of effects in Appendix B. In some cases, they are standard practices that are used in all similar projects and in other cases they are specifically tailored to this project based on site-specific factors such as the underlying land allocation and associated standards and guidelines.

2.2.1 Northern Spotted Owl

There are no known or predicted spotted owl activity centers (USDI Fish and Wildlife Service, USDI Bureau of Land Management, USDA Forest Service. September, 2008) within the disruption distance of the developed recreation sites in this EA (USDI Fish and Wildlife Service Letter of Concurrence August 2009). If any spotted owls are detected nesting within the disruption distance of one of the proposed recreation sites, covered by this document, in the future, hazard tree falling, and other potentially disruptive activities would be postponed until after the critical breeding period from March 1 through July 15th. The disruption distance for various activities is defined in the Letter of Concurrence (USDI Fish and Wildlife Service Letter of Concurrence August 2009). The disruption distance for heavy equipment is 35 yards and 65 yards for chainsaws. There is no disruption distance defined for camping or activities that do not change the ambient noise level for the site. The distance and timing may be modified by the unit wildlife biologist according to the guidelines addressed in the Fish and Wildlife Service Letter of Concurrence. All activities in this document are in accordance to the Revised Recovery Plan for the Northern Spotted Owl (U.S. Fish and Wildlife Service 2011) and the Northwest

2.2.2 Weed Free Feed

The Pacific Northwest Region of the Forest Service requires that all equestrians use weed free feed (Order No. R6-2009-001 which cites the authority of 36 CFR 261.58(t)). Signs alerting the public to this requirement are posted at all Forest entrances. Additional signing would be posted and maintained by hosts at the equestrian campgrounds considered in this EA.

2.2.3 Heritage Resources

Ground disturbing activities would be limited to routine repair and maintenance of recreation sites and facilities such as replacement of fire rings, barrier posts, picnic tables, bulletin boards and patching of parking pads. In the event that evidence is found of any evidence of heritage resource site(s), the concessionaire or Forest staff would halt any use or activity, protect the site and notify the Forest Archaeologist. Protection measures would be developed in consultation with the Oregon State Historic Preservation Officer (SHPO), appropriate Tribes, and, if necessary, the Advisory Council on Historic Preservation.

The Forest Archaeologist would review and approve the annual Operating Plan for any cleaning, maintenance or minor repairs of historic structures including washing, painting, or staining. Any major repairs or replacement of historic structure components would undergo separate NEPA analysis and be evaluated and approved by the Forest Archaeologist in consultation with the Oregon State Historic Preservation Officer (SHPO) and if necessary, the Advisory Council on Historic Preservation.

2.2.4 Hazard Trees

Hazard trees adjacent to campsites and campground facilities are felled for safety. If they are in riparian areas, the Western Oregon Programmatic consultation guide (Guide for Use of Western Oregon Programmatic consultation for routine annual activities that affect ESA-listed anadromous salmonids - NMFS 2011) discusses their disposition. Do not remove downed wood from sites in this category (except to clear trails and where downed wood poses a public risk) within the following distances: (1) 100 feet from streams with LFH (listed fish habitat); (2) 50 feet from perennial and intermittent streams within 1 mile of streams with LFH. For hazard trees to be cut due to trail clearing that are within the areas defined above, fall the trees towards streams where it is feasible to do so, and leave felled trees adjacent to the trails. For sites within this category that are within a distance from streams with LFH equal to one SPTH (SPTH is an abbreviation for site-potential tree height, or the typical maximum height of a tree for a particular type of site. A SPTH for the action area ranges from approximately 150 feet to 250 feet) where human use has compacted soils and/or degraded vegetation, or has increased the percentage of unstable streambank, retain all downed wood in degraded areas. Take steps to prevent firewood gathering and theft within riparian areas.

Outside of riparian areas, where downed wood is scarce, hazard trees would be saved and scattered on the disturbed areas to help block vehicle access and provide wildlife habitat.

2.3 Other Alternatives Considered

Some comments insisted that the Forest only issue a special use permit for management of Bagby Hot Springs to a “non-profit” enterprise or keep management of Bagby under direct Forest Service control. Another unique comment suggested that the only way to effectively manage Bagby Hot Springs is to change the user access by modifying roads and trails.

2.3.1 Limit the Pool of Competitors for a Concession Special Use Permit for Bagby Hot Springs to Non-profit Enterprises Only

A concession special use permit is the authorizing instrument that allows a government-owned facility where a fee is charged for public use to be managed by another party with responsibilities for operations and maintenance. Forest Service policy requires that concessionaire permits go through a competitive bidding process before they are issued if it is known that there is competitive interest in the permit (Forest Service Manual, Chapter 2344.03). That opportunity is generally a publicly-offered prospectus. The Forest Service cannot legally limit those opportunities to non-profit entities. Similarly, the Forest Service could not limit those opportunities to for-profit entities. The Forest Service has a Concessionaire Desk Guide and Prospectus template that it is required to use when issuing a prospectus. Requirements for the potential bidders to a prospectus include a business plan, financial operating capital, successful experience managing developed recreation sites, insurance, and an operating plan that complies with the terms and conditions in the prospectus and proposed special use permit. Once the Forest determines bidders are qualified, there are evaluation criteria to rank the bids. The process is competitive. The Forest Service is looking for a concessionaire that can best provide a safe, clean, functional, enjoyable recreational experience at the least cost to Forest users. Any non-profit or for-profit entity could apply to a prospectus. The Forest Service considered the input to limit operation of Bagby to a non-profit, but did not develop the alternative because it is not consistent with policy as described above.

2.3.2 Manage 27 Developed Sites (All But Bagby Hot Springs) Under Concession Management; and Keep Bagby Hot Springs Under Direct Forest Service Management.

In this proposition, Bagby Hot Springs would continue to be managed by Forest Service staff and volunteers. A term special use permit(s) would be issued to a concessionaire(s) for operation and maintenance of the other 27 developed recreation sites listed in Table 1.1.

This alternative would not be consistent with the Purpose and Need for action: to increase management efficiencies by harnessing economies of scale. The Forest believes that keeping one remote recreation site under direct Forest Service management would be highly inefficient from a business standpoint.

2.3.3 Change Public Access to Bagby Hot Springs by Modifying Access Roads and Trails

One responder suggested that a creative way to deal with negative elements at Bagby Hot Springs would be to restore access to the way it was in 1960: (1) take out the trail bridges and replace them simply with logs; (2) un-gravel Trail 544; and (3) decommission Road 70. The result of these actions would be to make access to Bagby Hot Springs possible only via a hiking trail greater than four miles long.

Trail 544 is currently a Class 5 trail from the Bagby Trailhead to the hot springs. According to National Trail Management Classes, Trail Class 5 trails are managed to accommodate intensive use by users with limited trail skills and experience. Removing the gravel and replacing the bridges with logs would reduce the trail management level. The resulting trail would not be any longer, but would probably discourage some users, particularly those with small children. Un-gravelling Trail 544 may also cause increased sedimentation of the Collawash River, a Wild and Scenic River. An important management objective of Wild and Scenic Rivers is to maintain water quality. In general, hand rails are required for all National Forest System trail and pedestrian bridges (Forest Service Handbook 7709.56b, Chapter 7.66 – Railings). In most cases, replacing the trail bridges with logs would be inconsistent with this direction (in the most primitive situations, such as Wilderness trails, curbs alone may suffice).

A key element of this proposed alternative is decommissioning Forest Road 70. This road has been evaluated as part of the Forest Roads Analysis (2003) and has been determined to be essential for administration of the National Forest. Decommissioning Forest Road 70 would make management access to Bagby more difficult. More difficult management access would not meet the project purpose and need to operate the site in a more cost efficient manner.

For the reasons discussed, this proposed alternative was considered but dropped from further study.

2.4 Comparison of Alternatives

Table 2.1 briefly compares the Alternatives against the components of the project purpose and need and also the concern discussed in part 1.10.5 of this EA (economic effectiveness).

Table 2.1. Comparison of Alternatives (compared to project purpose and need elements).

Element	Alternative A (No Action)	Alternative B (Proposed Action)
<p>Keep sites open for public use and enjoyment, and provide safe, clean, affordable, functional facilities</p>	<p>Some sites would likely be closed or decommissioned within 5 years. Sites most likely to be affected would be Big Eddy Day-Use, Bonney Crossing, Bonney Meadows, Keeps Mill, Knebal Springs, Little Badger, Pebbleford, Rainy Lake, and Tilly Jane Campgrounds.</p> <p>Site operation and maintenance would meet agency “meaningful measures” standards approximately 25% of the time.</p>	<p>All sites would remain open for at least the duration of the concession permit (5-10 years).</p> <p>Site operations would meet agency “meaningful measures” standards roughly 50% of the time (80% at Bagby). Effects would be cleaner restrooms, restrooms stocked regularly with toilet paper, cleaner firerings and picnic tables, and more frequent policing of the sites for litter and safety hazards.</p>
<p>Operate the sites in a more cost efficient manner and harness economies of scale (measure = net return to the government)</p>	<p>Net return to the government would be about -\$42,979 annually.</p> <p>The Forest Service would continue to manage all of the sites with agency staff and volunteers. The cost of operating and maintaining the campgrounds would exceed revenue generated (net difference of approximately \$38,598 in this alternative based on INFRA data), Since the Forest’s other campgrounds are already under concession, the Forest would not able to harness economies of scale from bundling all of the campgrounds under direct management.</p>	<p>Net return to the government would be about -\$7,323 annually.</p> <p>Management efficiencies and economies of scale would be achieved by bundling the sites in this proposal with the Forest sites already under concession management. The cost of operating and maintaining the campgrounds would exceed revenue generated (net difference of approximately \$6,558 in this alternative based on INFRA data), but the revenue from other fee sites in the permit (campgrounds that have previously been under concession management, not included in this analysis) would offset the deficit.</p>

CHAPTER 3 – ENVIRONMENTAL CONSEQUENCES

3.1 Chapter Organization

This chapter discusses the social and economic environments of the affected project area (the baseline or existing condition) and the expected effects or changes to those environments, if any of the alternatives were to be implemented. This chapter provides a summary of the scientific and analytical basis for comparing the alternatives. More detailed analysis is in the project file.

The chapter is arranged by resource topic, with the affected environment or existing condition discussion presented first, followed by the estimated project effects (direct and indirect), and then estimated cumulative effects.

Because no ground disturbing activities are directly related to this project, and no issues were raised concerning the physical or biological environment, the brief discussion of plants, animals, soil and water are in Appendix B. There would be no direct, indirect or cumulative effects to any of these resources from either of the Alternatives.

3.2 Recreation

The recreation section gives additional information about the existing situation and discloses the effects of implementing the No Action and the Proposed Action Alternatives.

3.2.1 Existing Situation

All of the sites included in this action, except Clackamas Lake Compound, Camp Cody, Spring Drive and Little John, were operated and maintained as developed recreation sites by Forest Service staff and volunteers through 2010 (Management Area A10 in the LMP). Table 3.1 displays the fee type and amount in 2010 for the sites in the proposed action. In 2011, all of the sites in Table 3.1 except for Bagby Hot Springs were managed by concessionaires under a one-year special use permit. The 2011 fees are also shown.

Except for Big Eddy Day-Use Area and Bagby Camping Area (aka No Horn), all of the recreation sites currently have a user fee charged by authority of the Federal Lands Recreation Enhancement Act (REA). Mt. Hood National Forest retains 95% of recreation fees collected at these sites. Revenue is used for operation and maintenance costs including the salary for seasonal employees who service the facilities and collect fees. Because these sites do not have potable water, it is difficult to recruit volunteer campground hosts to help manage the sites.

Bagby Camping Area (aka No Horn) has been managed for many years as a dispersed camping site with no overnight camping fee. There are few developments, however the camping area is adjacent to the Bagby Hot Springs trailhead which has a vault toilet. Campers routinely use the toilet facility. Parking in the camping area or at the Bagby Trailhead for the purpose of using Bagby Hot Springs requires payment of the standard amenity fee or displaying of a Northwest Forest Pass (\$5/day or \$30/year).

As stated in Chapter 2 of this document, security at Bagby Hot Springs has from time to time been a issue. Complicating factors are the remoteness of the site and the popularity of the site at night. When management presence is reduced, car clouting at the trailhead is a problem. Other problems that have been reported are drunk and disorderly conduct, assault, and illegal use of firearms. When law enforcement presence has been increased as it was in 2003-2004, unlawful behavior has diminished. Anecdotal evidence suggests that the ban on alcohol has had a positive effect.

Table 3.1. Existing recreation fee type and amount under Recreation Enhancement Act authority at Mt. Hood National Forest developed recreation sites in the project.

<i>Name of Site</i>	<i>Existing Use</i>	<i>Fee Type Under REA</i>	<i>2010 Fee</i>	<i>2011 Fee</i>
Badger Lake	Campground	Expanded Amenity	\$10/night	Closed
Bagby (aka No Horn)	Dispersed Camp	N. A.	No Fee*	No Fee*
Bagby Hot Springs	Day Use	Standard Amenity	\$5/day*	\$5/day*
Barlow Creek	Campground	Expanded Amenity	\$10/night	\$11/night
Barlow Crossing	Campground	Expanded Amenity	\$10/night	\$11/night
Big Eddy	Day-Use	Standard Amenity	No Fee	\$5/day
Black Lake	Campground	Expanded Amenity	\$10/night	\$10/night
Bonney Crossing	Campground	Expanded Amenity	\$10/night	\$11/night
Bonney Meadow	Campground	Expanded Amenity	\$10/night	\$11/night
Camp Cody	Admin Site	N.A.	No Fee	Closed
Clackamas Lake Guard Station	Cabin Rental	Expanded Amenity	\$140 - \$160 per night	\$150 - \$168 per night
Clackamas Lake Compound	Administrative Site	N.A.	No Fee	Closed
Clear Creek Crossing	Campground	Expanded Amenity	\$10/night	\$11/night
Cloud Cap Saddle	Campground	Expanded Amenity	\$10/night	\$10/night
Eightmile	Campground	Expanded Amenity	\$10/night	\$11/night
Forest Creek	Campground	Expanded Amenity	\$10/night	\$11/night
Keeps Mill	Campground	Expanded Amenity	\$10/night	\$11/night
Knebal Springs	Campground	Expanded Amenity	\$10/night	\$11/night
Little Badger	Campground	Expanded Amenity	\$10/night	\$11/night
Little John**	State Snopark**	N.A.**	No Fee**	Closed
Lower Eightmile	Campground	Expanded Amenity	\$10/night	\$11/night
McCubbins Gulch	Campground	Expanded Amenity	\$10/night	\$11/night
Pebble Ford	Campground	Expanded Amenity	\$10/night	\$11/night
Rainy Lake	Campground	Expanded Amenity	\$10/night	\$10/night
Spring Drive	Admin Site	N.A.	No Fee	\$28/night
Tilly Jane	Campground	Expanded Amenity	\$10/night	\$10/night
Wahtum Lake	Campground	Expanded Amenity	\$10/night	\$10/night
White River Station	Campground	Expanded Amenity	\$10/night	\$11/night

* Parking in the Bagby camping area (aka No Horn) for the purpose of using Bagby Hot Springs requires payment of the standard amenity fee or display of a Northwest Forest Pass.

** Little John Snopark has a use fee imposed by and payable to the State of Oregon from November 1 to April 30.

Bagby Hot Springs is currently managed by Forest Service staff. Until recently, the Northwest Forest Conservancy, a non-profit organization whose mission is dedicated to the protection, restoration, education, and responsible management of the forest, had a permit from Mt. Hood National Forest to restore the historic cabin at the hot springs site. That permit has expired. There is also a dormitory-type cabin at the hot springs that is used as an administrative facility. It is currently not available to the public as a lodging rental.

The three administrative sites included in Alternative B (Camp Cody, Clackamas Lake Compound and Spring Drive) are ordinarily not available to the recreating public except for events under special use authorization. Consequently, they do not have a recreation fee under REA.

Little John Snopark has a use fee imposed by and payable to the State of Oregon from November 1 to April 30. For the 2010-2011 winter season, the vehicle fee is \$4.00 for a one-day pass, \$9.00 for a three-day pass and \$25.00 for an annual pass. Pass vendors may also charge an administrative fee. During the summer months, there is no use fee charged by the Forest Service.

Clackamas Lake Guard Station is currently available as a lodging rental through the National Recreation Reservation Service (NRRS). A Forest Service volunteer host on site helps operate and maintain the cabin during the summer months when it is available to the public.

Table 3.2 summarizes management costs and average revenue at the sites included in Alternatives B. The \$10/night camping fee was established at these sites in 2005 following the enactment of REA. Prior to 2005, the campgrounds were part of the Fee Demonstration program; camping fees were \$5/night, and Northwest Forest Passes were accepted in lieu of fees. The current fees at Clackamas Lake Guard Station were set in 2009 after review by the Pacific Northwest Recreation Resource Advisory Committee. Bagby Hot Springs has been a Northwest Forest Pass site since the inception of the program.

The operation and maintenance costs shown in the Table 3.2 are Forest Service estimated costs to manage the sites to agency “meaningful measures” standards. The standards are listed in Appendix C of this document.

Collectively, the sites in the project generate insufficient revenue to cover operation and maintenance (O&M) costs (see Table 3.2); annual O&M costs are \$107,186, and annual revenue is currently only \$64,179. Only five sites (Badger Lake Campground, Clackamas Lake Guard Station, Eightmile Campground, McCubbins Gulch Campground, White River Station Campground) individually generate sufficient revenue to cover O&M costs; however of these five sites, only three (Clackamas Lake Guard Station, Eightmile Campground, and White River Station Campground) generate enough annual revenue to also retire deferred revenue in a reasonable period of time (less than 5 years). Because operating most of these sites with volunteer hosts has not proven to be a successful sustainable practice, many of the facilities are perpetually operated and maintained at a service level that does not meet “meaningful measures,” the agency benchmark for exceptional public service. Periodically, the Forest Service is able to retire some deferred maintenance tasks at these sites with appropriated funds (special capital improvement funds, or regular appropriations).

Table 3.2. Annual operation & maintenance (O&M) cost, deferred maintenance cost, average annual revenue, and average percent occupancy at Mt. Hood National Forest developed recreation sites in the project. Annual O&M and deferred maintenance costs are from Forest Service Infrastructure Database (2007 data); average annual revenue and average percent occupancy is actual 2007 data, except for Bagby Hot Springs which is 2011 data.

<i>Name of Site</i>	<i>Existing Use</i>	<i>Annual Cost of O&M</i>	<i>Avg. Ann. Revenue</i>	<i>Deferred Maintenance</i>	<i>Avg. % Occ.</i>
Badger Lake	Campground	\$1,310	\$1,416	\$8,278	24%
Bagby (aka No Horn)	Dispersed Camp	No Data	\$0	No Data	N.A.
Bagby Hot Springs	Day-Use	\$31,327	\$26,245	\$85,500	N.A.
Barlow Creek	Campground	\$6,498	\$485	\$250	16%
Barlow Crossing	Campground	\$6,455	\$650	\$2,390	11%
Big Eddy	Day-Use	\$1,666	No Data	\$0	N.A.
Black Lake	Campground	\$5,925	\$40	\$0	1%
Bonney Crossing	Campground	\$3,306	\$1,221	\$2,680	10%
Bonney Meadow	Campground	\$1,310	\$425	\$3,150	5%
Camp Cody	Administrative Site	No Data	\$0	No Data	N.A.
Clackamas Lake Guard Station	Cabin Rental	\$7,638	\$11,960	\$12,840	93%
Clackamas Lake Compound	Administrative Site	No Data*	\$0	No Data*	N.A.
Clear Creek Crossing	Campground	\$1,606	\$1,134	\$0	11%
Cloud Cap Saddle	Campground	\$2,361	\$1,203	\$50	26%
Eightmile	Campground	\$3,739	\$4,812	\$0	15%
Forest Creek	Campground	\$1,468	\$739	\$1,825	6%
Keeps Mill	Campground	\$1,453	\$820	\$2,102	11%
Knebal Springs	Campground	\$3,930	\$1,043	\$13,955	9%
Little Badger	Campground	\$1,197	\$150	\$3,178	3%
Little John	State Snopark	\$2,743	No Data	\$10,225	N.A.
Lower Eightmile	Campground	\$959	\$555	\$3,560	12%
McCubbins Gulch	Campground	\$3,340	\$6,250	\$35,320	19%
Pebble Ford	Campground	\$1,160	\$1,080	\$4,182	14%
Rainy Lake	Campground	\$5,501	\$390	\$21,145	6%
Spring Drive	Administrative Site	No Data	No Data	No Data	N.A.
Tilly Jane	Campground	\$6,807	\$380	No Data**	2%
Wahtum Lake	Campground	\$4,020	\$1,086	\$0	14%
White River Station	Campground	\$1,467	\$2,095	\$0	27%
TOTALS		\$107,186	\$64,179	\$210,630	

* Clackamas Lake Compound O&M and Deferred Mtc. costs in INFRA database include costs for many large structures which are not in the proposed action; so the data is unreliable for this analysis.

** Tilly Jane Deferred Mtc. Cost in INFRA includes A-Frame cabin which is not in the proposed action.

3.2.2 Effects of Implementing the Alternatives to the Recreation Resource

Alternative A – No Action: The Forest Service would continue to manage the 22 sites listed in Table 3.3 with agency staff and volunteers. Volunteers would continue their assistance with operations and maintenance at Clackamas Lake Guard Station. Volunteers would also periodically assist with maintenance at Bagby Hot Springs (Northwest Forest Conservancy), Knebal Springs Campground (Oregon Equestrian Trails and Backcountry Horsemen) and at McCubbins Gulch Campground (Mt. Scott Motorcycle Club). Some maintenance work would continue to be contracted. The visibility to the public of Forest Service management of these parts of the forest would remain at present levels. Based on professional judgement, the Forest estimates that it would continue to meet meaningful measures standards about 25% of the time.

Financially, the 22 sites would continue to generate insufficient revenue from user fees to pay for operation and maintenance (O&M) costs. Based on Forest Service INFRA data, it would cost approximately \$102,777 annually to operate and maintain the sites (see Table 3.3). As a check of the INFRA data, O&M costs were also calculated manually using the *Cost/Benefit Analysis for Conversion to a Concession Worksheet* (the Worksheet is from the Forest Service Campground Concession Desk Guide, FS-611, October 1997; the completed worksheet is in the project record). The Worksheet calculation revealed annual O&M costs to be approximately \$107,158, a result that is close to the first calculation. User fees at the 22 sites would generate approximately \$64,179 in revenue annually. As Table 3.3 shows, in this alternative there would be a deficit of approximately \$38,598 between annual O&M costs and annual revenue generated at the sites based on INFRA data (the deficit based on the Worksheet calculation would be slightly higher: \$42,979). The amount of the deficit is roughly three percent of the Forest's annual recreation appropriation (see Table 1.2). Prior to 2004, the Forest was routinely able to program this amount (sometimes more than this amount) for ground operations above and beyond general management costs. In 2004 the Forest's appropriated recreation budget dropped dramatically (see Table 1.2) and has remained relatively flat at a level roughly 85% of pre-2004 levels. However, since 2004 salary and supply costs have risen steadily. The Forest does not expect its budget to rise substantially in the future. Going forward, competing management and budgetary priorities would make it difficult to dedicate the amount necessary to enhance ground operations and field presence in order to improve visitor services. Because the Forest's other campgrounds are already under concession, the Forest would be unable to benefit from the economies of scale by bundling all of the campgrounds under its direct management.

Only five sites (Badger Lake Campground, Clackamas Lake Guard Station, Eightmile Campground, McCubbins Gulch Campground, White River Station Campground) individually would generate sufficient revenue from user fees to cover operation and maintenance costs (Table 3.2). Only three sites (Clackamas Lake Guard Station, Eightmile Campground, and White River Station Campground) would generate enough annual revenue to also retire deferred revenue in a reasonable period of time (less than 5 years). Without sufficient funds being spent to cover current maintenance needs at the remaining sites, deferred maintenance would continue to increase.

Without a substantial user fee increase and/or a change in operator (partner agreement, volunteer group) in the near future, it is highly likely that some sites may be closed or decommissioned.

Based on the 2007 Recreation Facility Analysis 5-Year Proposed Program of Work, the sites most likely to be affected would be Bonney Crossing, Bonney Meadows, Keeps Mill, Knebal Springs, Little Badger, Pebbleford, Rainy Lake, and Tilly Jane Campgrounds. Each of these sites has an RFA Rank Score of 50 or less and has a negative net annual revenue (RFA, pp. 11-14). The RFA recommendation to decommission Big Eddy Day-Use area would be implemented immediately.

Table 3.3. Alternative A annual operation & maintenance (O&M) cost, average annual revenue, revenue minus cost, and average percent occupancy at Mt. Hood National Forest developed recreation sites. Annual O&M and deferred maintenance costs are from Forest Service Infrastructure Database (2007 data); average annual revenue and average percent occupancy is actual 2007 data, except for Bagby Hot Springs which is 2011 data.

<i>Name of Site</i>	<i>Proposed Use in Alt. A</i>	<i>Annual Cost of O&M</i>	<i>Est. Ann. Revenue</i>	<i>Revenue Minus Cost</i>	<i>Avg. % Occ.</i>
Badger Lake	Campground	\$1,310	\$1,416	\$106	24%
Bagby Hot Springs	Day-Use	\$31,327	\$26,245	(\$5,082)	N.A.
Barlow Creek	Campground	\$6,498	\$485	(\$6,013)	16%
Barlow Crossing	Campground	\$6,455	\$650	(\$5,805)	11%
Black Lake	Campground	\$5,925	\$40	(\$5,885)	1%
Bonney Crossing	Campground	\$3,306	\$1,221	(\$2,085)	10%
Bonney Meadow	Campground	\$1,310	\$425	(\$885)	5%
Clackamas Lake Guard Station	Cabin Rental	\$7,638	\$11,960	\$4,322	93%
Clear Creek Crossing	Campground	\$1,606	\$1,134	(\$472)	11%
Cloud Cap Saddle	Campground	\$2,361	\$1,203	(\$1,158)	26%
Eightmile	Campground	\$3,739	\$4,812	\$1,073	15%
Forest Creek	Campground	\$1,468	\$739	(\$729)	6%
Keeps Mill	Campground	\$1,453	\$820	(\$633)	11%
Knebal Springs	Campground	\$3,930	\$1,043	(\$2,887)	9%
Little Badger	Campground	\$1,197	\$150	(\$1,047)	3%
Lower Eightmile	Campground	\$959	\$555	(\$404)	12%
McCubbins Gulch	Campground	\$3,340	\$6,250	\$2,910	19%
Pebble Ford	Campground	\$1,160	\$1,080	(\$80)	14%
Rainy Lake	Campground	\$5,501	\$390	(\$5,111)	6%
Tilly Jane	Campground	\$6,807	\$380	(\$6,427)	2%
Wahtum Lake	Campground	\$4,020	\$1,086	(\$2,934)	14%
White River Station	Campground	\$1,467	\$2,095	\$628	27%
TOTALS		\$102,777	\$64,179	(\$38,598)	

Although Bagby Hot Springs does not generate sufficient revenue by itself to defray operation and maintenance costs, decommissioning the site is not a practical option. With or without facilities, the hot springs would attract scores of visitors. The absence of facilities, such as toilets, could cause serious environmental problems and health issues. Behavioral conflicts (disorderly conduct, vandalism of facilities, alcohol abuse) and law enforcement issues (hazardous use of firearms; and theft of personal property, especially at the trailhead) would continue to occur.

Camp Cody, the small cabins and buildings at Clackamas Lake Compound, and the trailer pads at Spring Drive would not be managed as Recreation Facilities. Without a change in operator (partner agreement, volunteer group) in the near future, these facilities may be decommissioned. Little John and Bagby Campground (aka No Horn) would continue to be available to the public during the summer as dispersed recreation sites without management services.

Because there are no physical or biological effects associated with implementing the No Action alternative, and because no social or economic concerns were determined to be key issues (as defined by NEPA), there are no effects that would be cumulative with other current or likely foreseeable actions.

Alternative B – Proposed Action: All operations and tenant maintenance at the 28 sites listed in Table 3.4 would be performed by a concession operator(s). The concessionaire(s) would also complete much of the landlord maintenance, although Forest Service volunteers and contracts would accomplish some heavy maintenance or facility reconstruction. In general, the Forest Service would be present less frequently in the sites. On-site managers would wear uniforms and drive vehicles marked with the trademark of the concession entity. Although management policies would not change, Forest Service on-site management visibility would diminish.

The Forest conducted an income/expense analysis to determine the economic viability of concession operation at the 28 sites. Concession operation and maintenance (O&M) costs were determined two ways using different sets of financial assumptions. Table 3.4 shows concessionaire O&M costs based on Forest Service INFRA data with a few adjustments that are noted in the table. Concessionaire O&M costs were also manually calculated using the *Forest Service Income/Expense Worksheet for Determining Economic Viability* (the Worksheet is from the Forest Service Campground Concession Desk Guide, FS-611, October 1997; the completed worksheet is in the project record). The determination using INFRA data shown in Table 3.4 reveals that concession operation of these 28 sites alone would cost approximately \$118,730 annually. The determination using the Worksheet resulted in a similar cost of \$122,709 annually. Both results are higher than the assumed annual revenue of \$112,172 (see Table 3.4); the differences for the two calculations were \$6,558 and \$10,445, respectively (although actual concessionaire O&M costs may be different than those used in either of the determination methods). The analysis shows that the financial viability of a concession operation is better than traditional Forest Service management, however, there would still be a modest gap between expenses and revenue. Economies of scale resulting from bundling the 28 sites with the other, more economically viable campgrounds that are already under concession could bridge the gap (data about the economic efficiency of other campgrounds, based on INFRA, is found in the project record). Examples of cost centers where economies of scale might be achieved are: communication devices (radios, phones); garbage service/dump fees; vehicle expenses; liability insurance; management and overhead. The gap between expenses and revenue might also be bridged through targeted marketing, offering a more robust mix of services (for example, installing Yurts in some of the sites), or by using a different fee schedule.

The Forest also did a cost/benefit analysis for conversion of the 28 sites to concession management (a Cost/Benefit Analysis Worksheet is in the project record). The result of this analysis, net return to the government, was -\$7,323 compared to -\$42,979 for the No Action

Alternative. These are the amounts that would need to be covered by Congressionally appropriated funds for the Proposed Action and the No Action Alternatives, respectively.

The analysis showed that the improved financial situation in the Proposed Action would be possible with improvements to visitor services as well. The viability determination was calculated assuming 5.25 concession employees (five hosts and .25 maintenance employee). As a result, management presence would be moderately higher under concession management than under recent Forest Service management (2 to 3 Forest Service seasonal employees for the same sites). The wage rates paid by concessionaires are customarily about 60 to 70 percent of the wages paid to a GS-4 or GS-5 Forest Service employee (the customary pay grades for forestry technicians engaged in campground operations or fee collection). Therefore, campground revenue would purchase more concession staff time than Forest Service employee time. Concessionaire hosts would be quartered in the campgrounds, although no management scenario envisions a resident host in every campground. The effects of greater management presence would be cleaner restrooms, restrooms stocked regularly with toilet paper, cleaner firerings and picnic tables, and more frequent policing of the sites for litter and safety hazards. Campers would be contacted on a more regular basis to ensure that camping fees have been paid. Based on professional judgement, the Forest estimates that concession management would result in meeting meaningful measures standards 50% of the time at all of the sites except Bagby where the estimate would be 80% of the time during the high use season. The analysis also showed that approximately \$11,000 would be generated annually to reduce deferred maintenance (G-T Act fee offset). Also, it is expected that none of the sites would be decommissioned during the planning period in this Alternative.

Management presence at Bagby Hot Springs would be greater than in the No Action Alternative. This presence would be expected to have the following effects: fewer car break-ins at the trailhead; greater fee compliance; less litter at the springs, trailhead and campground; less overall lawlessness at the tub sites; more and quicker repairs to tubs and water supply and drains; and more consistent servicing of toilets. Based on comments received about the Proposed Action, reduced lawlessness would be welcomed by the public. And, no one argued in favor of more litter. However, greater management presence and strict fee enforcement may negatively affect the atmosphere at Bagby for some people.

Camp Cody, the small cabins and other buildings at Clackamas Lake Compound, and the trailer pads at Spring Drive would be added to the Recreation Facility Master Plan. Granger-Thye fee offset would be used to perform landlord maintenance and retire deferred maintenance. The recreation opportunities that would be provided by these sites would fill a niche not adequately provided at present by Mt. Hood National Forest. Likewise, offering Little John as a managed group camp during the summer months would broaden the Forest's developed recreation portfolio and make greater use of an existing facility.

Over the past decade, the concessionaire that operated Mt. Hood National Forest campgrounds requested camping fee increases of \$1.00/site/night at roughly two year intervals. Except for the last fee increase request, which coincided with the depth of the most recent world-wide economic recession, the Mt. Hood National Forest approved the requests. These increases averaged three percent per year. It is expected that fees at the campgrounds in the proposed action would increase an average of three percent per year under concession management.

Table 3.4. Alternative B annual operation & maintenance (O&M) cost, estimated annual revenue, revenue minus cost, and average percent occupancy at Mt. Hood National Forest developed recreation sites. Annual O&M costs are from Forest Service Infrastructure Database (2007 data) except for Bagby Campground, Camp Cody, Clackamas Lake Compound, and Spring Drive which are estimated(*); average annual revenue and average percent occupancy is actual 2007 data, except for Bagby Campground, Big Eddy Day-Use, Camp Cody, Clackamas Lake Compound, Little John, and Spring Drive which are estimated().**

<i>Name of Site</i>	<i>Proposed Use in Alt. B</i>	<i>Annual Cost of O&M</i>	<i>Est. Ann. Revenue</i>	<i>Revenue Minus Cost</i>	<i>Avg. % Occ.</i>
Badger Lake	Campground	\$1,310	\$1,416	\$106	24%
Bagby (aka No Horn)	Campground	\$3,204	\$4,536	\$1,786	20%
Bagby Hot Springs	Day-Use	\$31,327	\$52,490	\$21,163	N.A.
Barlow Creek	Campground	\$6,498	\$485	(\$6,013)	16%
Barlow Crossing	Campground	\$6,455	\$650	(\$5,805)	11%
Big Eddy	Day-Use Rec	\$1,666	\$630	(\$1,036)	20%
Black Lake	Campground	\$5,925	\$40	(\$5,885)	1%
Bonney Crossing	Campground	\$3,306	\$1,221	(\$2,085)	10%
Bonney Meadow	Campground	\$1,310	\$425	(\$885)	5%
Camp Cody	Cabin Rental	\$3,000	\$3,780	\$780	20%
Clackamas Lake Guard Stn.	Cabin Rental	\$7,638	\$11,960	\$4,322	93%
Clackamas Lake Compound	Cabin Rental	\$1,424	\$2,016	\$592	20%
Clear Creek Crossing	Campground	\$1,606	\$1,134	(\$472)	11%
Cloud Cap Saddle	Campground	\$2,361	\$1,203	(\$1,158)	26%
Eightmile	Campground	\$3,739	\$4,812	\$1,073	15%
Forest Creek	Campground	\$1,468	\$739	(\$729)	6%
Keeps Mill	Campground	\$1,453	\$820	(\$633)	11%
Knebal Springs	Campground	\$3,930	\$1,043	(\$2,887)	9%
Little Badger	Campground	\$1,197	\$150	(\$1,047)	3%
Little John	Group Camp	\$2,743	\$3,024	\$281	20%
Lower Eightmile	Campground	\$959	\$555	(\$404)	12%
McCubbins Gulch	Campground	\$3,340	\$6,250	\$2,910	19%
Pebble Ford	Campground	\$1,160	\$1,080	(\$80)	14%
Rainy Lake	Campground	\$5,501	\$390	(\$5,111)	6%
Spring Drive	Campground	\$3,916	\$7,762	\$3,846	20%
Tilly Jane	Campground	\$6,807	\$380	(\$6,427)	2%
Wahtum Lake	Campground	\$4,020	\$1,086	(\$2,934)	14%
White River Station	Campground	\$1,467	\$2,095	\$628	27%
TOTALS		\$118,730	\$112,172	(\$6,558)	

* Bagby Campground and Clackamas Lake Compound assume \$178/site. Spring Drive assumes \$356/site (because of utility costs). Camp Cody assumes seasonal cost of \$3,000.

** Assumes 126 operational nights annually with 20% occupancy. Assumes same fee schedule as recent FS charges (\$10/night for campgrounds; \$5/day for day-use) except: Spring Drive Campground = \$28/night; Camp Cody = \$150/night/group; Little John = \$120/night/group. Assume \$5/person fee for Bagby Hot Springs.

Because there are no physical or biological effects associated with implementing the Proposed Action, and because no social or economic concerns were determined to be key issues (as defined by NEPA), there are no effects that would be cumulative with other current or likely foreseeable actions.

3.3 Heritage Resources

The National Historic Preservation Act and the National Environmental Protection Act both require consideration be given to the potential effect of federal undertakings on historic resources, (including historic and prehistoric cultural resource sites). The guidelines for assessing effects and for consultation are provided in 36 CFR 800. To implement these guidelines, in 2004, Region 6 of the USDA Forest Service entered a Programmatic Agreement (PA) with the Oregon State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP).

In accordance with the 2004 Programmatic Agreement (PA), the issuance of special use permits to a concessionaire to operate and maintain 28 developed recreation sites on the Forest would fall under the category of undertakings with no potential to cause effects (Stipulation III.c.13: Issuance of special-use permits, easements, and other agreements where no surface disturbance is authorized and where no properties greater than 50 years old are involved.). These types of activities are excluded from case-by-case review, and require no further archaeological obligations because no ground disturbing activities are directly related to the Proposed Action (and No Action). Any ground disturbing activities would undergo NEPA analysis as the projects arise.

For the developed recreation sites where historic structures may be involved, the issuance of these permits would also fall under the category of undertakings with no potential to cause effects (Stipulation III.c.14: Renewals, assignments and conversions of existing special-use permits, easements and other agreements where existing stipulations in the permit are sufficient to protect any historic properties that may be involved."), also as defined within the 2004 PA. As outlined in the Design Criteria, the Annual Operating Plan outlining any routine cleaning and maintenance of historic structures would be reviewed by the Forest Archaeologist and subject to approval by the Forest Service.

Because there are no physical or biological effects associated with implementing either the No Action or the Proposed Action Alternatives, and because no social or economic concerns were found to be key issues (as defined by NEPA), there are no effects that would be cumulative with other current or likely foreseeable actions.

3.4 Environmental Justice – Civil Rights

Executive Order 12898 directs agencies to identify and address disproportionately high and adverse human health or environmental effects of projects on certain populations. This includes Asian Americans, African Americans, Hispanics, American Indians, low-income populations and subsistence uses. The Civil Rights Act of 1964 prohibits discrimination in program delivery

and employment. There are communities with minorities and low-income populations that may be affected by the project. The towns of Estacada, Dufur, Sandy, the Villages of Mt. Hood, Government Camp, Pine Grove, Hood River, Parkdale, and Maupin are the nearest communities around the sites proposed in this Environmental Assessment. Even farther away, but potentially affected, are the Native American communities of Warm Springs and Grande Ronde. There are no known areas of religious significance. There are areas of huckleberry habitat surrounding some of the developed recreation sites. There are no known special places for minority or low-income communities among the developed recreation sites included in this analysis.

Camping and visiting developed recreation sites considered in this analysis are potential destinations for minorities or people with lower-incomes. All the developed sites currently have a range of user fees. Both the No Action and Proposed Action alternatives would continue to charge fees in order to cover the cost of providing services at these sites. The fees would mirror site fees at surrounding developed recreation sites on federal and state facilities with similar services. Dispersed camping is authorized anywhere on the Forest where it is not specifically prohibited. Dispersed camping can offer a no-fee alternative for those unable to afford campground fees. In many cases, the dispersed campsites have rock fire rings, log benches around the fire ring and are along streams, creeks and lakes. No adverse civil rights impacts were identified. There would be no measurable direct or indirect effects to environmental justice or civil rights. Because no social concerns were found to be key issues (as defined by NEPA), there are no substantive effects that would be cumulative with other current or likely foreseeable actions.

CHAPTER 4 – LIST OF PREPARERS AND REFERENCES

LIST OF PREPARERS

Team Member	Role
Kathryn Arndt	Fisheries Biologist
Christine Arredondo	Recreation Staff Officer Reviewer/Editor
Alan Dyck	Wildlife Biologist
Mike Dryden	Acting Forest Archaeologist
Malcolm Hamilton	Recreation and Special Use Permit Specialist/Team Lead
David Lebo	Botanist
Michelle Lombardo	NEPA Specialist
Kathleen Walker	Writer
Mike Redmond	Writer/Editor
Allie Wenzl	Forest Archaeologist/Historian

REFERENCES

Bengston, David N. and David P. Fan. 2000. The Public Debate About the Recreation Fee Demonstration Program on the U.S. National Forests. St. Paul: USDA Forest Service, North Central Research Station and University of Minnesota.

Bowker, J. M., H. K. Cordell, and Cassandra Y. Johnson. 1999. User Fees for Recreation Services on Public Lands: A National Assessment. Journal of Park and Recreation Administration, Volume 17, Number 3. pp. 1-14.

Burns, Robert C. and Alan R. Graefe. 2006. Toward Understanding Recreation Fees: Impacts on People with Extremely Low Income Levels. Journal of Park and Recreation Administration, Volume 24, Number 2. 20 pp.

Grewell, J. Bishop. 2002. Government vs. Environment (Chapter 9) - All Play and No Pay: The Adverse Effects of Welfare Recreation. Lanham: Rowman & Littlefield Publishers Inc. 15 pp.

Howes, S.W. 1979. Soil Resource Inventory, USDA Forest Service, Pacific Northwest Region, Mt. Hood National Forest.

Kerstetter, Deborah L., Andrew J. Mowen, Nathan E. Trauntvein, Alan R. Graefe, Toni Liechty, and Kayce D. Zielinski. 2010. Visitor' Opinions of Who Should Provide Services and Amenities in State Parks. Journal of Park and Recreation Administration, Volume 28, Number 4. pp. 21-36.

- Kirshenbaum, Michael. 2006. The Effect of Access Fees on Visitation to Public Lands in Whatcom County, Washington. Bellingham: Western Washington University.
- Kyle, Gerard T., Alan R. Graefe, and James D. Absher. 2002. Determining Appropriate Prices for Recreation on Public Lands. *Journal of Park and Recreation Administration*, Volume 20, Number 2. pp. 69-89.
- McCune, B. and L. Geiser. 1997. *Macrolichens of the Pacific Northwest*. Corvallis: Oregon State Univ. Press.
- Mellon et al. 2003. DecAID, the Decayed Wood Advisor for Managing Snags, Partially Dead Trees, and Down Wood for Biodiversity in Forests of Washington and Oregon. Pacific Northwest Research Station, USDA Forest Service.
<<http://wwwnotes.fs.fed.us:81/pnw/DecAID/DecAID.nsf>>
- More, Thomas A. and Robert E. Manning. 2004. The Public Functions of Parks and Protected Areas. Burlington: USDA Forest Service, Northeast Research Station and University of Vermont. 5 pp.
- Mowen, Andrew J., Gerard T. Kyle, William T. Borrie, and Alan R. Graefe. 2006. Public Response to Park and Recreation Funding and Cost-saving Strategies: The role of Organizational Trust and Commitment. *Journal of Park and Recreation Administration*, Volume 24, Number 3, pp. 72-95.
- Quinn, Tom. 2002. A Public Utility Model for Managing Public Land Recreation Enterprises. USDA Forest Service, General Technical Report PNW-GTR-543, May 2002. 23 pp.
- Samnaliev, Mihail, Thomas Stevens, and Thomas More. 2004. Attitudes Towards Alternative Management Policies for Public Recreation Lands. Amherst: University of Massachusetts. Department of Resource Economics Working Paper No. 2004-1. 24 pp.
- USDA Forest Service. 1988. General Best Management Practices, Pacific Northwest Region, 11/88.
- USDA Forest Service. 1990a. Final Environmental Impact Statement for the Mt. Hood National Forest Land and Resource Management Plan and Record of Decision (Forest Plan).
- USDA Forest Service. 1990b. Mt. Hood National Forest Land and Resource Management Plan. (Forest Plan).
- USDA Forest Service. 1998a. Final Environmental Impact Statement on Managing Competing and Unwanted Vegetation and the Record of Decision and the Mediated Agreement. Pacific Northwest Region.

USDA Forest Service. 1998b. North Willamette Late-Succession Reserve Assessment. Pacific Northwest Region, Mt. Hood National Forest.

USDA Forest Service. 1999. Stemming the invasive tide: Forest Service strategy for noxious and nonnative invasive plant management. Washington Office. Washington, D.C.

USDA Forest Service. 2004. General Water Quality Best Management Practices, Mt. Hood National Forest, June 2004.

USDA Forest Service. 2005. Record of Decision for Preventing and Managing Invasive Plants, October 11, 2005.

USDA Forest Service. 2006. Biological Assessment (Northern Spotted Owl), July 7, 2006.

USDA Forest Service. 2007. Record of Decision to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines. July 2007.

USDA Forest Service. 2007. Recreation Facility Analysis: 5-Year Program of Work and Programmatic Results of Implementation. Mt. Hood National Forest. July 2008.

USDA Forest Service. 2008. FEIS Site-Specific Invasive Plant Treatments for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon, including Forest Plan Amendment #16.

USDA Forest Service and USDI Bureau of Land Management. 1994a. Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl (Northwest Forest Plan). Portland, Oregon.

USDA Forest Service and USDI Bureau of Land Management. 1994b. Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl; Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest related Species within the Range of the Northern Spotted Owl (Northwest Forest Plan). Portland, Oregon.

USDA Forest Service and USDI Bureau of Land Management. 2001. Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines. (Survey and Manage Plan)

USDA Forest Service, USDI Bureau of Land Management, USDI Fish and Wildlife Service, 2001. Draft Memorandum of Understanding to Promote the Conservation of Migratory Birds. December 4, 2001.

USDA Forest Service and USDI Bureau of Land Management. 2004. Record of Decision and Standards and Guidelines to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines. March 2004.

USDI Fish and Wildlife Service. 2008. Final Recovery Plan for the Northern Spotted Owl, *Strix occidentalis caurina*. U.S. Fish and Wildlife Service, Portland, Oregon. xii + 142 pp.