



9/30/2022

Mt. Hood National Forest  
Attn: Recreation Fees  
16400 Champion Way  
Sandy, OR  
97055

Submitted via email: [SM.FS.MtHoodFees@usda.gov](mailto:SM.FS.MtHoodFees@usda.gov)

**RE: Access Fund, High Desert Climbers Alliance and Portland Area Climbing Coalition Comments on the Proposed Mt. Hood Climbing Permit**

Access Fund, High Desert Climbers Alliance (HDCA), and Portland Area Climbing Coalition (PACC) appreciate the opportunity to provide comments on the proposed Mt. Hood Climbing Permit. Mt. Hood is a popular mountain to climb due to its accessibility and proximity to larger urban centers like Portland, OR. Climbers have been summiting Mt. Hood for over 100 years. We are eager to work with the Forest Service to find the best possible management strategies to ensure the long-term sustainability of climbing in the area.

**About Access Fund**

The Access Fund is a national advocacy organization and accredited land trust, that leads and inspires the climbing community toward sustainable access and conservation of the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. For more information about the Access Fund, visit [www.accessfund.org](http://www.accessfund.org).

**About High Desert Climbers Alliance**

The High Desert Climbers Alliance serves the climbing community of Central Oregon through stewardship of its climbing resources and advocacy on their behalf.

**Portland Area Climbing Coalition**

The Portland Area Climbing Coalition (PACC) is a 501c(3) member-based, nonprofit consisting of local climbers with the goal of land-stewardship and maintaining access to local climbing areas. In addition to trail work and route maintenance, PACC creates and maintains contacts with land owners, works with national level conservation groups, and helps map long-term

projects for Portland climbing areas. For more information about PACC, visit [www.oregonclimbers.org](http://www.oregonclimbers.org).

## **Comments**

Mt. Hood National Forest (Forest) is proposing a new climbing permit be required for climbers traveling above 9,500 feet on Mt. Hood. The permit would cost users \$20 and be valid for two days. An annual pass would be available for \$100. Permits would likely be administered through [recreation.gov](http://recreation.gov), and be required between April and July of each year. Currently the proposal does not include a limit or quota on permits. The revenue from the proposed new permits would help pay for facility improvements, additional climbing ranger staff, improve climber education, support local search and rescue, and reduce impacts on the natural landscape. Access Fund, HDCA, and PACC have several suggestions for adjustments to the proposal that we request the Forest consider for the long term accessibility and sustainability of Mt. Hood.

### **Need for Visitor Use Numbers and Cost Benefit Analysis**

We support the Forest's efforts to increase staffing from one part time ranger to a full time ranger and two part time rangers. We also support increased efforts to manage human waste issues and increase climber education. However, the current proposal lacks visitor use numbers, it is unclear how many climbers currently climb above 9,500 ft annually on Mt. Hood. Subsequently it is unclear how much money the Forest would make from the new \$20 permit per climber on an annual basis. No data was presented to the public describing budgetary needs from the Forest. A cost benefit analysis should be conducted to compare the expected revenue from the permits to how much money the Forest actually needs to fund three new climbing ranger positions, support SAR, and pay for upgrades to infrastructure. In addition alternative funding sources should be explored prior to putting all the financial burden on Mt. Hood climbers.

### **Fees and Equity Considerations and Displacement Study**

The proposal of adding a \$20 fee to climb Mt.Hood once or an annual pass of \$100 raises complex equity issues. The Forest has not presented a cost benefit study or explored how these new fees may impact low-income populations' ability to climb Mt. Hood. In addition the new fee could discourage some people from visiting Mt. Hood. A displacement study should be conducted to better understand the correlation between fees and how this might impact and/or displace low-income populations. We understand that fees can be necessary to protect the lands we all love, and that fees are often necessary for the continued management of specific public lands. With that said, if the Forest intends to fully consider the justice, equity, diversity, and inclusion ramifications of the fee increases proposed, the Forest must also have a plan to deal with the negative impacts of the increase on marginalized communities. This does not currently exist.

Furthermore, the proposal suggests the use of an online system (recreation.gov) to acquire a permit to access Mt. Hood. Additional recreation.gov fees should be included in the proposed \$20 dollar fee instead of in addition to the permit fee. For example if the recreation.gov fee is \$8 then the permit itself should cost \$12, the public should not have to pay an additional administrative fee (i.e. \$20 + \$8) due to the Forest using the third party booking site recreation.gov. While the use of recreation.gov is fairly standard practice across federal land agencies, it can create a barrier for individuals who do not have access to a computer, internet, and a credit card. We suggest the Forest have permits available for the day of purchase with cash/check at the ranger station or self-pay kiosk (i.e. a walk-up option); this is a permit method used at Mt. Shasta.<sup>1</sup> This would provide all sectors of the population fair access to Mt. Hood. We urge the Forest to work with the local community to advance inclusive and equitable access to Mt. Hood.

We support that there will be no quotas or reservations needed for climbers to access Mt. Hood. We encourage the Forest to maintain this decision. If in the future the Forest decides there is a need to limit the number of climbers on Mt. Hood, an additional public process should be held to explore this issue and ensure the public is involved.

### **Federal Lands Recreation Enhancement Act**

During the public meeting Forest staff stated that the proposed permits and fees were legal under the Federal Lands Recreation Enhancement Act (FLREA) under a Special Recreation Permit Fee. FLREA defines a Special Recreation Permit Fee as:

*Special Recreation Permit Fee-The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use.<sup>2</sup>*

Furthermore FLREA states:

*The Secretary shall not charge an entrance fee for Federal recreational lands and waters managed by the Bureau of Land Management, the Bureau of Reclamation, or the Forest Service.<sup>3</sup>*

Finally FLREA states a standard amenity fee can be charged for the following:

*Standard amenity recreation fee  
Except as limited by subsection (d), the Secretary may charge a standard amenity recreation fee for Federal recreational lands and waters under the*

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<sup>1</sup> <https://www.fs.usda.gov/detail/stnf/home/?cid=stelprdb5353013>

<sup>2</sup> [https://uscode.house.gov/view.xhtml?req=\(title:16%20section:6802%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:16%20section:6802%20edition:prelim))

<sup>3</sup> Ibid.

*jurisdiction of the Bureau of Land Management, the Bureau of Reclamation, or the Forest Service, but only at the following:*

- (1) A National Conservation Area.*
- (2) A National Volcanic Monument.*
- (3) A destination visitor or interpretive center that provides a broad range of interpretive services, programs, and media.*
- (4) An area-*
  - (A) that provides significant opportunities for outdoor recreation;*
  - (B) that has substantial Federal investments;*
  - (C) where fees can be efficiently collected; and*
  - (D) that contains all of the following amenities:*
    - (i) Designated developed parking.*
    - (ii) A permanent toilet facility.*
    - (iii) A permanent trash receptacle.*
    - (iv) Interpretive sign, exhibit, or kiosk.*
    - (v) Picnic tables.*
    - (vi) Security services.<sup>4</sup>*

We request further clarification and justifications be given by the Forest related to how the proposed Mt. Hood climbing permit meets the requirements of FLREA. The activity of individuals or small groups climbing Mt. Hood does not meet the definition of a Special Recreation Permit Fee. Additional improvements would have to be made to justify a standard amenity fee since the permit only applies above 9,500ft where there are no amenities provided such as toilets, trash, signage, picnic tables, ect. We request the Forest provide details on the metrics used to determine the proposed fee amount. In addition, we request a detailed budget on how these fees will be used towards restoration, education and enforcement measures for future management of these Mt. Hood under the new fee structure.

### **Indirect and Cumulative Impacts**

An analysis of the indirect and cumulative impacts should be conducted to assess if adding fees will displace people to other areas in the Forest that do not charge fees. This displacement could cause resource management issues and unintended impacts to other areas with less infrastructure and management.

### **Permit and Fee Recommendations**

Several recommendations were made during the public meeting that our organizations support.

1. We recommend the permit system start as a 1-2 year pilot program to allow the Forest to collect user data and demonstrate that the presence of additional climbing rangers does in fact reduce search and rescue needs and reduce climber impacts to Mt. Hood.

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<sup>4</sup> [https://uscode.house.gov/view.xhtml?req=\(title:16%20section:6802%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:16%20section:6802%20edition:prelim))

2. We recommend the annual fee amount be reduced \$30-40 dollars a year which is more in line with other nearby volcano and mountain climbs.
3. We recommend the \$20, 2-day fee be re-evaluated at the end of the pilot program and justified or changed based on the amount of income generated by the permits in relation to budgetary needs of the Forest to maintain the climbing program at Mt. Hood. The 2-day permit should be allowed to be used at a different date if weather conditions change and the climber is unable to use their permit on the days they originally purchased it for. This flexibility will ensure that climbers continue to choose their ascent based on good weather windows and not feel pressure to climb because they purchased a permit.
4. The Forest should explore options for the public to obtain a volunteer pass through service hours. The addition of a volunteer pass option to cover permit fees would provide frequent visitors of the Forest an opportunity to provide service for the Forest Service for the season.
5. A full budget should be made available to the public.
6. We encourage the Forest to continue to partner with local climbing and SAR groups as well as our organizations to explore alternative funding mechanisms to contribute to SAR and pay for climbing ranger positions. The entire burden of these costs should not be placed solely on the public.
7. Finally, we recommend permits be required above 10,000 ft rather than 9,500ft. It is common for hikers to go to Devil's kitchen and turn around and not summit Mt. Hood.

### **Access Fund, HDCA, and PACC Assistance**

The Access Fund, HDCA, and PACC are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, and other management needs the Forest may require to provide for the outstanding opportunities found at Mt. Hood. In addition, some aspects of this planning initiative may qualify for the Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which helps maintain, climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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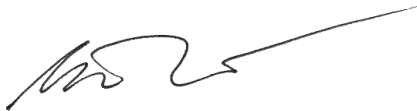
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Thank you for your consideration of these comments on the Forest's proposed Mt. Hood Climber Permits. Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. We look forward to continuing to work with the Forest. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 545-6772 or via email ([katie@accessfund.org](mailto:katie@accessfund.org)) to discuss these matters further.


Sincerely,



Katie Goodwin, Access Fund Policy Analyst



Max Tepfer, High Desert Climbers Alliance



Andrew Traylor, Portland Area Climbing Coalition

Cc:

Erik Murdock, Access Fund VP of Policy and Government Affairs

Chris Winter, Access Fund Executive Director