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First name: Ashley

Last name: Lipscomb

Organization:

Title:

Comments: These comments are submitted to draw more attention to issues with Wilderness management and to support the ban on bolting and anchors in Wilderness.

Public Comment: Red River Gorge Management Planning- Wilderness Comments

To Mr. Kazmierski:

Kentucky Heartwood and the Kentucky Resources Council are providing comments concerning the scoping and draft Environmental Assessment and the Finding of No Significant Impact for the Red River Gorge Geological Area that is available on the Red River Gorge Management Plan project page. We have included our recommendations to ensure the plan fits the law, science, and Forest Plan for the Daniel Boone National Forest.

We feel the need to place a finer point on the Forest Service's plans to designate campsites in Wilderness and express support for the banning of new bolts and fixed anchors in the Clifty Wilderness. The Clifty Wilderness is the one place in the Red River Gorge where the Forest Service can protect Wilderness character because of objectives and standards in the Forest Plan and in the Wilderness Act of 1964.

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Designating campsites in the Clifty Wilderness

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Language from the proposed plan:

In the Clifty Wilderness, we are proposing to designate up to 60 (of the proposed 200) backcountry campsites and manage these designated sites as part of the larger Red River Gorge campsite management and reservation system. This would limit the number of campers and campsites to preserve solitude and ecological integrity in wilderness, and to maintain its [ldquo]untrammelled[rdquo] wilderness character. When the untrammelled quality is preserved, wilderness ecological systems are essentially unhindered and free from the actions of modern human control or manipulation. We will use a [ldquo]Minimum Requirements Analysis[rdquo] (MRA) to determine the minimum requirements to plan and administer proposed designated camping in wilderness as required by the Wilderness Act. Designation of campsites in wilderness with associated site delineation signage would not occur without approval from the regional forester.

Trammel is defined as a hobble or restraint on a horse. The use of [ldquo]untrammelled[rdquo] in the Wilderness Act was specifically used by the authors to say that Wilderness should not be constrained by man[rsquo]s will. You are confusing untrammelled with trampling. Campsite designation is imposing man[rsquo]s will and does not protect the spirit of unconfined recreation. Here is specific language from the Wilderness Act:

(c) A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for

solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

The Forest Service is claiming they will protect the untrammeled character of the Clifty Wilderness by essentially trammeling it with designated campsites. The Forest Service should definitely protect the Wilderness from being trampled, but there are other methods for doing this that the FS has not tried. The Forest Service immediately swung to a very last resort option before considering a free permitting system. Other national forests have implemented this sort of system.

According to the Forest Plan section 2.A. titled Clifty Wilderness (pg. 3-39 through 3-42), there are several protective measures that must be adhered to or the Forest Service risks legal action.

Solitude is not a subjective measure and needs to be protected through legal measures. How you protect it is important and we feel there are other ways besides designating campsites in Wilderness. How it is protected is addressed in another section. Your forest plan mentions protecting solitude several times:

A-Goal 1. Allow natural processes to proceed while managing visitor use at a level compatible with the Wilderness resource without loss of solitude or unacceptable depreciation of Wilderness qualities.

2.A-Goal 2. Provide opportunities for primitive, dispersed recreation featuring the [ldquo]naturalness[rdquo] of the environment, solitude, physical and mental challenge, and inspiration that is consistent with preservation of the Wilderness resource.

2.A-Objective

2.A. Manage the social and managerial setting for primitive recreation opportunity spectrum experiences that provide a high degree of solitude, self-reliance and challenge.

2.A-Objective 2.E. Design and manage the trail system consistent with Wilderness objectives for solitude, physical and mental challenge, spirit of adventure, and self reliance. Trail design

will control the level of public use. Long-distance trails that pass through the Wilderness, such as the Sheltowee Trace National Recreation Trail, will be consistent with Wilderness management trail guidelines.

Please analyze our alternative listed below that focuses on people management, not harnessing the landscape. Decommissioning illegal campsites along with a permit system and a bigger presence of Wilderness Rangers should alleviate the need to establish designated campsites in Wilderness. This will give Wilderness rangers the ability to enforce laws and regulations and alleviate [ldquo]we didn[rsquo]t know[rdquo] scenarios. Wilderness is our highest form of landscape protection, but it is also a place that should be a self-willed landscape that provides solitude.

Before resorting to designating campsites, the Forest Service should also first analyze and implement the following plan:

1. Establish a free-permit system for backcountry travel
2. Require permit applicants to read laws and regulations pertaining to Wilderness travel and sign an agreement to abide. This allows for rigorous enforcement.
3. Require users to carry portable fire pans in the backcountry. It is unclear what kind of plans the Forest Service is proposing in terms of developing designated campsites in the backcountry. Please expand upon your idea so it can be analyzed using the Wilderness Act.
4. Hire more Wilderness and River Rangers to enforce the laws.

The following objective in the Forest Plan supports this suggestion and fulfills the agency[rsquo]s need to educate folks before they enter the Clifty Wilderness:

2.A-Objective

- 2.C. Provide resources and information to visitors entering the Wilderness so they have

[ldquo]wilderness awareness[rdquo] and practice a [ldquo]leave no trace[rdquo] ethic. They should understand that:

- a) Wilderness is primitive and rugged b) Outdoor skills are necessary for using wilderness c)

They have a responsibility for their own safety d) They will need to leave the wilderness as

they found it.

Please do not compromise the Wilderness Act because you are exasperated by the users. Make changes to how you manage the people, not how you manage the place by violating the Wilderness Act. Designated campsites degrade Wilderness. You've abdicated your responsibility to the Wilderness resource and don't see any easy way out.

Here are some other recommendations for analysis:

- Any permit system should be set up as a "first come, first served" system open to all members of the public without a user fee;

- Retain the current campfire set back of 100 feet from trails and water;

- Increase Forest Service presence and visitor education in the Clifty Wilderness; and

- Analyze indirect methods for limiting or reducing impacts in these Wildernesses that don't confine visitors once they enter, including discouraging marketing of the areas, providing more primitive trailheads and access to trailheads, lower trail standards and maintenance levels, and fewer developments designed to facilitate easier access.

- Any work should be done with the least primitive tools that fit with the mandate to avoid motorized and mechanical equipment in Wilderness.

Fires in the Clifty Wilderness

It is unclear how the Forest Service plans to "prohibit open fires in the Clifty Wilderness." The plan seems unclear as to how this will be achieved.

What if the Forest Service required the use of fire pans for fire blankets in the backcountry? It's hard to keep people from starting fires anywhere. Requiring a fire pan or blanket would put the responsibility and the onus on the user if they want a fire. If a wildland fire starts, and a trackable free permit system is in place, it could make it possible to find and fine the culprits. We are trying to think outside of the box. While avoiding unintentional fires set by humans cannot be completely guaranteed, several areas such as the Boulder White Clouds and the Sawtooth National Recreation

Areas have instituted such restrictions. It's also necessary to ban fires during certain times of the year as well.

Restoration of User-Created Impacts

It's sad to read that 650 unauthorized campsites and 150 miles of unauthorized trails dot and crisscross the RRGGA. This wasn't just because of an influx of visitors because of COVID-19, this is due to years of the Forest Service abdicating their responsibility to protect the Red River Gorge, and the Clifty Wilderness fell victim to this. This should never have been allowed to persist. We appreciate that the Forest Service plans to rehabilitate the area, which could be very costly and time consuming. Once decommissioning of campsites, etc. is complete, it will be imperative for the Forest Service to protect this work with a larger presence of law enforcement officers (Wilderness rangers, river rangers, etc.). Education is important, but enforcement makes the education real, especially for those who operate above the law.

Also, any restoration work should be completed with the following standard in the Forest Plan:

2.A-ENG-2. The use of motorized equipment is not allowed unless approved by the appropriate Forest Service Line Officer within their delegated authority.

Please also identify where natural processes may recover certain areas without direct manipulation:

2.A-Objective

1.A. Natural processes will be relied upon to recover degraded Wilderness resources unless damage will continue, without intervention.

Prohibit installation of new bolts and fixed anchors in the Clifty Wilderness.

We support the agency's position to uphold this forest plan standard. Good job! What concerns Kentucky Heartwood is that this is the only place in all of the documents that make up the Red River Gorge Management Plan that discusses rock climbing.

Installations and bolts are inconsistent with the Wilderness Act as they are considered permanent and oftentimes require motorized and mechanized equipment to drill them into the rock permanently eroding the sedimentary rock that makes up the Gorge. Banning permanent climbing

anchors in Wilderness is imperative to protect Wilderness character. Your decision is consistent with:

2.A-REC-5. No new rock climbing routes with fixed anchors are allowed. However, maintenance or replacement of existing approved fixed anchors is allowed by non-mechanized means.

Placing permanent routes and setting bolts with mechanized tools in Wilderness is inappropriate special use for the Wilderness setting. The climbing community has ample places to climb on their private property and outside of the Clifty Wilderness.

LANDS 2.A-LAND-1. Allow no special uses that are inappropriate for the wilderness setting.

Kentucky Heartwood suggests that the Forest Service consider creating and adopting a Climbing Management Plan, just as they are creating a Comprehensive River Management Plan. This will define where rock climbing is acceptable and not acceptable in the Red River Gorge. It would also require the agency to look at how climbing may impact PET species through consultation with other federal agencies, which falls in line with the Forest Plan here:

2.A-Goal 8. Provide protection for known PETS species populations and aid recovery of habitat and populations in areas of their previous habitation.

The Red River Gorge is recognized internationally for rock climbing opportunities, making it imperative to really establish a game plan. Other national forests have implemented Climbing Management Plans and this should be considered for the Red River Gorge (and the whole Daniel Boone National Forest).

Conclusion

Please reverse course on your plans to violate the Wilderness Act and consider creating and adopting a Climbing Management Plan.

Sincerely,

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Director

Kentucky Heartwood

Tom Fitzgerald

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