

Data Submitted (UTC 11): 1/29/2024 8:25:53 PM

First name: Robert

Last name: Price

Organization:

Title:

Comments: My detailed comments are attached in pdf letter format. The bullet points included follow:

*Technical climbing not only meets the definition of "solitude or a primitive and unconfined type of recreation," it is often in fact a determining quality of wilderness and its preservation is therefore consistent with the mandate to "preserve wilderness character." It in my opinion is the ultimate example of primitive and unconfined recreation and in many cases the highest use of a given resource.

*While the term "installation" was not defined by the Wilderness Act, it would be disingenuous to deny that fixed anchors are subject to regulation. However, comments made by those who passed the legislation are highly supportive of recreation and most concerned with landscape level intrusions. Management principles should recognize and reflect this intent.

*The standard of "the imprint of man's work substantially unnoticeable," combined with the guiding principle of "except as necessary to meet minimum requirements for the administration of the area," provide the basis for a more workable management framework than that proposed.

*The Agency in its proposed guidance has described two extremes within the world of technical climbing, "climbing that does not rely on use and placement of fixed anchors..." and "bolt-intensive climbing..." I will argue that the majority of technical climbing in wilderness falls somewhere in between these two extremes and that your proposed management plan cannot succeed without recognizing this.

*The Agency likely does not currently have the knowledge to determine what constitutes the "minimum necessary" to administer the Act nor does it have the technical expertise to perform minimum requirements analysis as proposed. It can through cooperative action gain this expertise.

*The Agency may successfully impose or negotiate a moratorium on new anchors but as written the policy leaves open the possibility of removal of existing anchors by the Agency. It is not in its best interest to initiate removal of existing fixed anchors lacking a local forest climbing management plan.

*The Agency at the Forest Supervisor and District Ranger level should engage with local climber organizations to develop workable management plans and to establish criteria for what is "necessary" and the "minimum requirement." Additionally, forest rangers should seek training from these organizations in aspects of technical climbing.

*Climbing Management Plans should differentiate different types of climbing resources for different management standards and processes, as the Agency does for recreation site types. These resource types can be established using the monitoring criteria the Agency currently possesses. Resource types can then be managed using a programmatic MRA approach for administration purposes, where applicable, rather on a case-by-case basis.

*Consideration of a permit-based user system for climbing routes is generally unnecessary, may be counter to the concepts of unrestrained use and self-reliance, and may contribute to a higher risk level for wilderness climbers.

*The Agency should explore the applicability of the Other Features of Value Quality of wilderness as it may relate to historically and culturally significant climbing resources.