

Data Submitted (UTC 11): 1/26/2024 6:56:06 PM

First name: UNJIN

Last name: LEE

Organization:

Title:

Comments: To whom it may concern,

It is clear that the increasing popularity of recreational climbing has and will continue to have significant impact on the wilderness character of Wilderness designated areas, challenging the untrammelled quality of the Wilderness. The proposed rule aims to reduce the impact of climbing on such qualities of Wilderness designated areas through the reduction of fixed anchors present in these areas, stating that "the combined impact of many fixed anchors in a single area or rock wall can have a significant effect on wilderness character." Furthermore, the Director's Order 41, section 7.2 states that "The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management due to the concentration of human activity which they support, and the types and levels of impacts associated with such routes." However, when considering the effect of the proposed rule, the rule's impact on two competing demands must be balanced. Specifically, the proposed rule's impact on both the ability of an individual to engage in safe recreational activity pursuant to the Wilderness Act, Director's Order 41, and Reference Manual 41, and the proposed rule's impact on concentrated human activity which may degrade a given area's wilderness character.

The ultimate goal of Wilderness Stewardship is preservation of Wilderness character through the reduction of human impact. While the proposed rule's utilization of Minimal Requirements Analysis would likely reduce the concentration of human activity in a given area, this is a poor solution to the problem of over-use as it does not properly consider the proposed rule's potential impact on an individual's safety and well-being while engaging in recreational activities like climbing. Indeed, as the correlation between bolting and activity is relied upon for reasoning in 7.2, other factors, including but not limited to distance and remoteness, are significantly more likely to determine human activity rather than the abundance of fixed anchors. Such factors that affect the concentration of human activity can be both within and outside of the control and purview of the USFS. For example the availability of permits granting access to Wilderness designated areas may be easily adjusted while the accessibility of more remote regions may be difficult if not impossible to control.

Like outdoor climbing in other designations of private or public lands, climbing in Wilderness designated areas is an inherently complex and unpredictable activity. Given this elevated risk, special consideration must be given to harm-reduction methods that are available to climbers when balancing safe recreation with the impact of human activity on Wilderness designated areas. As alternative strategies for impact reduction exist that do not also place individual activity at risk, it is imperative that the USFS consider these strategies before the adoption of the proposed rule. Given the possibility of severe injury or death while climbing, which would necessitate the wilderness act-approved usage of motorized vehicles/aircraft and its associated impact of wilderness character, it is imperative for the NPS to fully consider alternate strategies, including including the availability of general use wilderness permits. In particular, such strategies would reduce the risk placed on climbers in emergent situations while also allowing the appropriate Stewards to achieve its goal of reducing human activity.

Thank you for your time.