



THE AMERICAN ALPINE CLUB

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DEPUTY DIRECTOR

February 9, 2001

Regional Forester Harv Forsgren
Attn: 1570 Appeals
PO Box 3623
Portland OR 97208-3623

Re: Appeal of Mt. Hood, Hatfield, Salmon-Huckleberry Wilderness Record of Decision

Dear Mr. Forsgren:

This letter constitutes interested party comments regarding the appeal of Mt. Hood Forest Supervisor Gary L. Larsen's December 6, 2000 Decision Notice and Finding of No Significant Impact regarding management of the Mt. Hood, Salmon-Huckleberry and Hatfield Wildernesses (henceforth referred to as the "Mt. Hood Wilderness"). The correspondence is filed pursuant to 36 CFR 215.13(e). Since The American Alpine Club filed written comments to the initial draft Environmental Assessment on March 26, 1999, and filed written comments to the revised draft Environmental Assessment on August 15, 2000, we have statutory standing to comment as an interested party in the appeal proceedings.

The American Alpine Club, founded in 1902, is the oldest national organization representing the interests and concerns of American mountaineers and rock climbers. Since its inception, the AAC has actively advocated on behalf of wilderness designation and expansion, including testifying on behalf of the Wilderness Act of 1964. While our mission statement is long and varied, the major points include:

- conservation and preservation of mountain and polar regions of the world
- exploration and scientific study of mountain and polar regions of the world
- promoting and disseminating knowledge about the mountains through our meetings, libraries and publications
- representing the interests and concerns of the American climbing community.

The AAC's current membership numbers almost 6,200 individual members throughout the US and abroad, including almost 700 in Oregon and Washington. We also represent more than 52 climbing-related businesses that have joined our corporate membership program, as well as several thousand individuals who are members of our affiliate mountaineering clubs. Our members are frequent visitors to wilderness, averaging 74 days climbing per year, according to a 2000 membership survey. They pursue wilderness-dependent recreation through climbing glaciated peaks and rock formations that generally are located only in designated wilderness. Consequently, our members would be affected directly by the management plan adopted in the Record of Decision, as well as the appeals filed by Wilderness Watch and Messrs. Bill Worf and Joseph Higgins (henceforth referred to as "appellants").

Before responding to the specific complaints enumerated by the appellants, it is important to spend a moment discussing the Wilderness Act and its intent to preserve for current and future generations lands

that largely will be unmodified by humans. The Wilderness Act came about as a result of concern that humans were permanently changing natural lands through construction of homes, buildings and other structures, logging forests and mining sub-surface minerals, and imposing large-scale human objects such as roads, dams, aircraft landing strips, and electrical transmission towers. The Act, which was pushed largely by local hiking, climbing, and outdoor conservation organizations, sought to protect against these macro level impacts.

The Wilderness Act is not a strict conservation document that seeks to manage untouched or pristine lands. In fact, neither word can be found in the entire Act. Though written more than 30 years prior to the Act's eventual adoption, Bob Marshall commented in "The Problems of the Wilderness" that "certain infringements on the concept of an unsullied wilderness will be unavoidable in almost all instances." This philosophy continued through the eventual adoption of the Wilderness Act in 1964. Short of keeping humans out, the framers of the Act knew that there always would be some form of human impact – hence the reference in the definition of wilderness to such soft terms as "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (Emphasis added.) The framers knew human use and visitation of wilderness would leave minor scars on the landscape. But, as long as these intrusions on the resource were minor and did not fundamentally change the wild character of the land, these minor scars were the price of protecting the land in its largely natural state. This explains the Act's numerous balancing tests that frequently weigh use and preservation.

It also is important to recall that the framers of the wilderness movement sought not just to protect land, but also to protect human contact with the land, and the primitive struggle this entailed. Bob Marshall wrote movingly about the positive human qualities that would be brought about by contact with the wilds.

But toting a fifty-pound pack over an abominable trail, snowshoeing across a blizzard-swept plateau, or scaling some jagged pinnacle which juts far above timber all develop a body distinguished by soundness, stamina, and élan unknown amid normal surroundings.

More than mere heartiness is the character of physical independence which can be nurtured only away from the coddling of civilization. In a true wilderness if a person is not qualified to satisfy all the requirements of existence, then he is bound to perish. As long as we prize individuality and competence it is imperative to provide the opportunity for complete self-sufficiency. This is inconceivable under the effete superstructure of urbanity; it demands the harsh environment of untrammelled expanses...

Adventure, whether physical or mental, implies breaking into unpenetrated ground, venturing beyond the boundary of normal aptitude, extending oneself to the limit of capacity, courageously facing peril. Life without the chance for such exertions would be for many persons a dreary game, scarcely bearable in its horrible banality.¹

The wilderness value of primitive recreation continued to permeate all aspects of the Wilderness Act over the years as it made its way through the Congressional process. Less than two months before the Wilderness Act was signed into law by President Lyndon Johnson, Senator Ernest Gruening published remarks by U.S. Supreme Court Justice William O. Douglas, an avid climber, that reiterated the primitive recreation focus of the bill.

Running fast-water rivers, or exploring chains of lakes by canoe, hiking ridges, scaling cliffs, traversing a glacier with the aid of ice axe, foraging for food in alpine basins – these are the ways for building character; and they are vital in the American saga. Some

¹ Bob Marshall, "The Problems of the Wilderness," *The Scientific Monthly*, February 1930.

will not want these adventures. But the opportunities should be left for those great great grandsons of ours who do turn their faces to the peaks rather than to the playgrounds.²

Protecting the opportunity for future generations to experience primitive and unconfined wilderness-dependent recreation is as vital a management goal for the Forest Service as the protection of natural conditions. According to the Forest Service's policies on wilderness management, the test the agency must use to determine whether use must be curtailed is whether human use will "trammel" the wilderness (i.e. it will "impede the free play of natural forces or interfere with natural processes in the ecosystem.")³

The appellants would have you believe Supervisor Larsen's Record of Decision will have catastrophic repercussions on the Mt. Hood Wilderness, that the wilderness as we know it is in such a precarious state that failure to enact significant and unprecedented use restrictions on the wilderness in its entirety will cause the resource to be irreparably harmed. The appellants raise a number of issues in their appeals that they believe are problematic to the Act, federal land management rules, and the agency's management policies. We believe their positions are incorrect. We believe Supervisor Larsen's plan strikes an appropriate balance between use and preservation, the same kind of balance that is reflected in the Wilderness Act itself. We will address the most pertinent issues individually below.

Appellants' Argument: While recreation is an acceptable use in wilderness, it must give deference to the protection of the environment when there is a conflict between the two resources. Unstated, but implied, is that recreation is a threat to wilderness values, rather than a wilderness value itself.

AAC Response: Many people who interpret the Wilderness Act today seem to gloss over the role primitive and unconfined outdoor recreation played in the development of wilderness thought and in securing passage of the Wilderness Act of 1964. It is important to remember that many of the first champions of wilderness were people who ventured into the farthest reaches of the wilds while hiking, hunting, fishing, mountain climbing and horseback riding.

The Boone and Crocket Club, the nation's first conservation organization, was founded in 1887 by Theodore Roosevelt and other hunters who pushed to conserve the natural areas in which they customarily hunted. Before John Muir became famous for his pioneering conservation efforts, including the establishment of Yosemite National Park, he was an avid hiker and mountain climber who explored vast tracts of the Sierra, Alaska and the Cascades. Similarly, it is difficult to separate Bob Marshall from his backpacking and climbing trips in the Adirondacks, or to remove David Brower from the walls of Yosemite and Shiprock, where he was a leading climber of the day and pioneered countless new technical rock climbing routes. (With the exception of Marshall, all were either officials or honorary members of The American Alpine Club, Muir having served as the Club's second president.)

For these and other wilderness champions, conservation measures were not an abstract notion; their efforts flowed out of a desire to protect from development and resource extraction those areas they visited that touched their souls. Dave Foreman recently wrote about "the real wilderness idea," in which he put on paper the essence of what likely motivated the conservation pioneers, as well as what serves to motivate most people who engage in non-motorized recreation and who consider themselves conservationists.

I've been a wilderness backpacker for 40 years, a wilderness river runner for more than 30. During the several thousand days and nights I've spent in the wilderness for fun and for conservation, I've had a few hundred companions (not all at once!). I've heard their thoughts about wilderness while plodding up dusty switchbacks, floating past canyon

² William O. Douglas, Associate Justice of the U.S. Supreme Court, "America's Vanishing Wilderness," in Senator Ernest Gruening's "Our Wilderness Must Not Vanish," *Congressional Record*, July 6, 1964, p. 16012.

³ US Forest Service Policy Manual #2320.5(2).

walls aglow in sunset flame and passing Scotch around the campfire. On many of these trips, my friends and I were checking out the wilderness qualities of unprotected areas and putting together boundary proposals to send to Congress for designation. In the 1970s, I wrote a widely-used guide, "How To Do A Wilderness Study." From all this, I got a very clear idea of wilderness, one that is widely shared with other conservationists doing the same thing.⁴

Primitive recreation was a clear and consistent reason expressed in Congress supporting the designation of wilderness throughout the years leading up to passage of the Wilderness Act of 1964. In fact, a reading of the Congressional discussion of the Wilderness Act usually finds recreation listed first among many reasons for wilderness designation. While speaking to a community group in the spring of 1957, Rep. John P. Saylor commented that:

This I consider a key concept of this legislative proposal; namely that wilderness can be preserved where it is, without disturbing the uses to which the areas are now put... Therefore, it is important to emphasize the preservation program...is recognized as part of an overall outdoor program... Hunting, fishing, camping, hiking, skiing, mountain climbing, pack tripping, nature photography, scenic appreciation, boating, canoeing – all these...comprise...the American way of living which you and I cherish.⁵ (Emphasis added)

Wilderness recreation also was viewed by many in the wilderness movement to be a way through which time-honored primitive skills could be kept alive in a world that was fast becoming overrun by technology and modern conveniences. In January 1961, while speaking to S. 174, a forerunner to the bill that eventually would become the Wilderness Act, Sen. Clinton P. Anderson quoted President-elect Kennedy regarding the importance of wilderness recreation.

In the words of President-elect John F. Kennedy...this "age of leisure and abundance can destroy vigor and muscle tone as effortlessly as it can gain time. Many of the routine physical activities earlier Americans took for granted are no longer part of our daily life... The television set, the movies, and the myriad conveniences and distractions of modern life all lure our young people away from the strenuous physical activity that is the basis of fitness in youth and in later years..." [O]ur wilderness areas give us a chance to develop physical fitness and adventurous habits of mind, as well as find relief for jaded minds, tense nerves, and soft muscles.⁶

And, when Sen. Frank Church spoke to the Endangered American Wilderness Act of 1977, he reiterated that Congress did not intend to restrict recreational use of wilderness lands.

It was not the intent of Congress that wilderness be administered in so pure a fashion as to needlessly restrict its customary public use and enjoyment. Quite the contrary, Congress fully intended that wilderness should be managed to allow its use by a wide spectrum of Americans.⁷ (Emphasis added)

⁴ Foreman, Dave, "The Real Wilderness Idea," 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

⁵ Rep. John P. Saylor's Address before the Wilderness Club of Philadelphia Conservationists, Inc., April 11, 1957, in Sen. Wayne Morse's, "Our Outdoors," *Congressional Record*, 85th Congress, 1st Session, April 18, 1957, pp. 6016-6017.

⁶ Sen. Clinton P. Anderson, "National Wilderness Preservation System," *Congressional Record*, 87th Congress, 1st Session, January 5, 1961, p. 192.

⁷ Sen. Frank Church, "Endangered American Wilderness Act," *Congressional Record*, 95th Congress, 1st Session, p. S 17400, October 20, 1977.

The appellants imply that recreation should be held as a secondary use of wilderness behind the protection of solitude and strict conservation. But, Congress has the power to restrict recreational access to wilderness areas to protect undisturbed conditions related to scientific study. It exercised this authority in the creation of the Indian Peaks Wilderness in Colorado when it set aside the Niwot Ridge international biosphere reserve.

It is the understanding of all parties involved that the 2,500-acre Niwot Ridge exclusion will be managed by the Forest Service to strictly protect its terrain and vegetation for scientific research and educational purposes, and I would point out that this may require the Forest Service to restrict or prohibit any recreational use of the 2,500-acre proposed biosphere reserve.⁸ (Emphasis added)

The failure of Congress to exercise this authority in other areas must be interpreted as an affirmative indication that recreational use is allowed in areas that have not been restricted. Recreational use must not be allowed to “trammel” the wilderness, but Forest Service policy sets a very high threshold for this – impeding the free play of natural forces or interfering with the natural processes in the ecosystem. The appellants have not demonstrated how primitive recreation, either in the high-use Use Management Areas (UMAs) or in the low-use primitive portions of the Mt. Hood Wilderness, will surpass this threshold.

This discussion of Congressional intent is important, because it clarifies that wilderness lands were established to serve multiple purposes, recreation among them. As the U.S. District Court for the District of Columbia ruled in its final decision in the Wilderness Watch v. Robertson case:

Thus, the statute clearly directs defendants (Forest Service) to administer the Wilderness with an eye not only towards strict conservation, but also to ensure the “use and enjoyment of the American people.”

The Wilderness Act does not direct defendants to pursue a single, limited purpose, as plaintiffs suggest, but it instead requires them to serve a number of public purposes, and to foster “recreational, scenic, scientific, educational, conservation, and historical use.” *16 U.S.C. § 1133(b)*. For this reason, defendants’ management decisions must consider all these purposes, and defendants must undertake a minimum of administration, in order to make the Wilderness accessible to those Americans who wish to use it.⁹ (Emphasis added)

The way the Record of Decision – and the appellants’ appeals – affects mountain climbing as a separate and distinct wilderness recreational pursuit is important due to the almost total dependence on wilderness for opportunities to climb glaciated peaks in the contiguous 48 American states. The Cascade Range in which Mt. Hood is located is the primary chain of glaciated mountains in the lower 48 states. Other ranges have high peaks where technical mountaineering and rock climbing can occur in a wilderness setting, but the Cascade volcanoes are, practically speaking, the only accessible peaks in which glacier travel can occur. These peaks are located almost exclusively in designated wilderness administered either by the Forest Service or the National Park Service. Thus, climbing glaciated mountains is an entirely wilderness-dependent recreational activity. Climbers displaced by a restrictive limited entry permit system, which the appellants desire, will have no other reasonably proximate alternative areas in which to pursue their activities.

Forest Service policy manual #2323.12(3) directs the agency to:

⁸ Sen. Roncalio, “Indian Peaks Wilderness Area,” *Congressional Record*, 95th Congress, 2nd Session, p. H 9502-9506, September 12, 1978.

⁹ Wilderness Watch v. Robertson, 1998, U.S. Dist., Lexis 14457 at 18 (Dist D.C. 1998)

Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.

It would appear that adopting a rigid management scheme that unduly restricts access would conflict with this agency policy and the Wilderness Act. While the EA indicates that those seeking solitude have ample opportunities to find it on some hiking trails and destinations within the Mt. Hood Wilderness, mountain climbers do not enjoy this luxury. They cannot seek out non-wilderness areas on which to pursue this form of appropriate primitive recreation.

The Record of Decision does not place recreation above other wilderness values, but it also does not make recreation a subservient value in wilderness. Primitive recreation always has been an integral part of the wilderness movement, and the unnecessary restriction of wilderness-dependent recreation must be avoided. This does not mean to imply that recreation should not be limited in any way, shape or form. Clearly, if recreation causes unacceptable physical impacts, it should be limited. But those limits should come only after the agency has exhausted all potential intermediate actions to prevent degradation of the wilderness resource short of keeping people out. The Record of Decision recognizes that intermediate actions should be considered first, but also indicates that use limits will be imposed if these initial steps do not prove fruitful. In fact, a few areas would see immediate use limits due to current levels of visitation.

Appellants' Allegations: Designating and hardening backcountry campsites and installing composting toilets will compromise wilderness by utilizing unnecessary "installations" that are prohibited by the Wilderness Act.

AAC Response: All visitors to wilderness cause some disruption to the physical resource. The crucial question is how much disruption is acceptable, and what steps can be taken to minimize, whenever possible, the amount of disruption that is caused by recreational use.

When considering these questions, it is important to understand that human use of wilderness areas through hiking, climbing, backcountry camping and horseback riding cause an infinitesimally small amount of damage to the overall wilderness resource. Researchers have found that primitive recreational use usually results in less than .05 percent of the total land surface of a park or wilderness area being disturbed through all trails, campsites and structures.¹⁰ The revised Mt. Hood Wilderness EA specifically notes that mountain climbing on Mt. Hood causes virtually no impact to the physical resource (EA at p. 86). Despite very high use, trail impacts are negligible and result primarily from poor location, design or maintenance (EA at p. 70). The most significant impact has come from an excess number of campsites and social trails near them (EA at pp. 71-78). Yet, while this recreational impact may be insignificant in terms of the wilderness as a whole, the localized impacts can be significant – especially if they affect sensitive plants and animal habitat. Therefore, administrative steps can and should be taken to minimize unnecessary impacts when and where they occur.

Wilderness researchers have found that making minor modifications to backcountry campsites, such as designating sites using small, unobtrusive signs, providing fire rings at a site, and making slight modifications to the grade of a tent site can reduce the size of backcountry campsites tremendously.¹¹ These are tools that have been used widely throughout the country in Forest Service and Park Service administered wilderness areas. As the Forest Service well knows, the Wilderness Act does not prohibit all installations in wilderness as the appellants imply; Section 4(c) clearly authorizes installations that are "necessary to meet minimum requirements for the administration of the area for the purpose of this Act."

¹⁰ Leung, Yu-Fai, Jeffrey L. Marion and Janet Y. Ferguson, "Methods for Assessing and Monitoring Backcountry Trails Conditions: An Empirical Comparison." In: Harmon, David, ed. "Making Protection Work: Proceedings of the 9th George Wright Society Conference on Research and Resource Management in Parks and on Public Lands," Albuquerque, NM. Hancock, MI: The George Wright Society: 406-414.

¹¹ Leung, Yu-Fai and Jeffrey L. Marion, "Recreation Impacts and Management in Wilderness: A State-of-Knowledge Review," 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

Forest Service management policies also allow such permanent improvements as “trails, toilet buildings, cabins, fences, tent frames, fire grills, and instrumentation stations”¹², as well as the designation of backcountry campsites¹³. (Emphasis added)

Scientific research into the effects of trampling on vegetation, disturbance of ground soils, and other impacts associated with overnight use – the issue in the EA primarily associated with physical resource impacts in the Mt. Hood Wilderness – clearly supports the approach taken by Supervisor Larsen in the Record of Decision regarding these minimal installations.

Decisions about the use of site hardening and facility development actions in wilderness are particularly difficult. A constructed and maintained trail is a permanent wilderness facility designed both to facilitate wilderness travel and protect resources. Such facilities can involve vegetation disturbance, soil excavation and deposition, and the potential disruption of surface water movement. However, a properly managed trail system limits the areal extent and severity of recreation impacts by concentrating traffic on resistant tread surfaces... Similarly, although less common in wilderness, designated campsites can be located, constructed and maintained to substantially reduce the areal extent and severity of camping impacts. The Wilderness Act clearly permits managers to employ such facilities, although their use must be justified as the minimum means for managing sustainable visitation.¹⁴ (Emphasis added)

Lest there be confusion about what Congress meant by allowing these minimal installations designed to protect the wilderness resource, two comments in the Congressional record directly addressed this issue during debate on the Endangered American Wilderness Act. Rep. Morris Udall, while commenting on the legislation, said:

A frequent argument one hears is that the Wilderness Act precludes sanitary facilities. But this is simply not true. Nor does the act prohibit other basic wilderness camping developments, if necessary, such as developed trails, protected water supplies or handpumps, campfire rings, rustic directional signs, and the like.¹⁵ (Emphasis added)

The Senate Energy and Natural Resources Committee also commented in one of their reports regarding acceptable installations designed to minimize human impact on the physical resource. (It is interesting to note that the specific wilderness cited is the Mt. Jefferson Wilderness, the next major Cascade volcano located to the south of Mt. Hood.)

To assure clarity on these issues, the committee wishes to reemphasize that hand water pumps, rustic fire rings, and sanitary facilities (including privies, pit or vault toilets) may be provided and maintained in wilderness areas – including the Mt. Jefferson Wilderness. The test simply rests on the question of whether such installations are “necessary” and “minimum” for the proper administration of the area, for the protection of the public, or as a management tool for the protection of the wilderness area.¹⁶ (Emphasis added)

¹² US Forest Service Policy Manual #2320.5(5).

¹³ US Forest Service Policy Manual #2323.13a.

¹⁴ Leung, Yu-Fai and Jeffrey L. Marion, “Recreation Impacts and Management in Wilderness: A State-of-Knowledge Review,” 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

¹⁵ Rep. Morris K. Udall, “Endangered American Wilderness Act,” *Congressional Record*, 95th Congress, 1st Session, p. E 1054-8, March 1, 1977, p. E 1058.

¹⁶ Senate Energy and Natural Resources Committee Report 95-490, “Endangered American Wilderness Act of 1977,” October 11, 1977, p. 8.

And in the House Committee on Interior and Insular Affairs report regarding enabling legislation that enacted the Indian Peaks Wilderness, Congress spoke to the need for designating campsites as one means of controlling physical impacts in high-use wilderness areas:

The committee recognizes that the restriction of visitors through the use of permit systems, establishment of designated camping sites, prohibition on open fires or gathering of firewood, and other methods, has been necessary in wilderness areas which receive very high public use.¹⁷ (Emphasis added)

It seems inconceivable that these management techniques, which have been shown through numerous studies to protect the physical resource from damage, would be contrary to the Wilderness Act when Congress specifically indicated their approval multiple times during wilderness-related debates. These techniques have been used for years and continue to be in widespread use in Forest Service-administered wilderness areas across the country. The unsubstantiated allegation that any form of toilet necessarily will have to be removed by helicopter is preposterous; most of the high-use locations proposed for UMA designation are readily accessible by non-motorized forms of transport, including pack stock.

If Superintendent Larsen's Record of Decision is overturned and the appellants' wishes are granted, little will be done to counteract the limited physical resource problems identified in the EA. The Record of Decision firmly courts the middle ground that will improve the physical resource through closure of excess campsites and social trails, while protecting the resource from further degradation without unnecessarily restricting human access to primitive and unconfined recreational opportunities. It also contains triggers that will restrict recreational use in high-use areas if significant impacts begin to be noted in the physical resource.

Appellants' Allegation: The Record of Decision is improper because it will result in degradation of wilderness character, since solitude will not exist sufficiently in these three wilderness areas. The entire Mt. Hood Wilderness must provide outstanding opportunities for solitude, and not just at certain times or in certain places.

AAC Response: We agree with Supervisor Larsen that the plain meaning of the Act should be viewed as binding. Section 2(c)(2) of the Wilderness Act merely requires that wilderness lands offer "outstanding opportunities for solitude or a primitive and unconfined type of recreation." (Emphasis added). Having worked in the Oregon Legislature where the difference between "may" and "shall" is clearly understood – and frequently a matter of intense debate – it is inconceivable that federal legislators who worked on a piece of legislation for almost nine years would not know the difference between "and" (meaning both conditions must be met simultaneously) and "or" (meaning both conditions can, but do not have to be met simultaneously). We understand the Act to mean that wilderness would generally be characterized by solitude and primitive recreation, though some areas may at a given time be characterized more by solitude or more by primitive recreational opportunities.

We also dispute the implicit assumption expressed by the appellants that solitude, as described in the Act, necessarily is defined by the number of human encounters experienced during a given time period. The Wilderness Act never defines solitude, nor does it link solitude to human encounters. The focus on human encounters is entirely the creation of wilderness managers and social scientists who have sought to develop an easily applied numerical standard by which to manage solitude. Even social scientists are aware of the distinct limitations on this science, because it may force people to opine on a subject that is essentially meaningless to them. For example, David Cole and William Hammitt prepared a recent paper in which they discuss problems with managing wilderness based on human encounter norms.

¹⁷ House Committee on Interior and Insular Affairs Report 95-1460, "Creating the Indian Peaks Wilderness Area and the Arapaho National Recreation Area and to Authorize the Secretary of the Interior to Study the Feasibility of Revising the Boundaries of the Rocky Mountain National Park," August 9, 1978.

Tolerance/acceptability curves and standards are useful for investigating recreation user reaction to use levels, and they offer a means of formulating management standards of tolerable and acceptable use levels; but these standards still involve a preference rather than actual reaction to use levels. Some researchers have criticized the procedure because it forces respondents to formulate tolerance standards when, in fact, they may not care about use encounters and thus have not formulated valid tolerable and acceptable use limits (Roggenbuck and Williams 1994).¹⁸ (Emphasis added)

Rather than focus exclusively on the number of human encounters experienced as the defining aspect of solitude, we believe it is important to consider other valid interpretations of the term – especially those definitions that are more in keeping with the expressed intent of Congress.

A preliminary reference point regarding the definition of solitude can be found in the dictionary. Webster's Seventh New Collegiate Dictionary contains the following entry for the word solitude:

1. the quality or state of being alone or remote from society: SECLUSION 2: a lonely place (as a desert) SYN SOLITUDE, ISOLATION, SECLUSION mean the state of one who is alone. SOLITUDE may imply a condition of being cut off by wish or compulsion from friends and neighbors; ISOLATION stresses detachment from others often because of circumstances not under one's control; SECLUSION suggests a shutting away or keeping apart from others often connoting deliberate withdrawal from the world or retirement to a quiet life.¹⁹

Of these three related terms, solitude and seclusion share commonalities, since they both include a notion of voluntary removal, at least partially mental, from society, as opposed to isolation, which implies the elimination of contact from society and people. Isolation carries much more of the physical separation that is inherent in the human encounter standard than does solitude, which allows for a notion of relative separation from society.

The dictionary definition of solitude is, in fact, remarkably similar to the ones used by wilderness philosophers who juxtaposed the solitude of wilderness with the rigid, stifling rules of contemporary urban society. The previously cited remarks from Marshall speak of the “character of physical independence” that is contrasted with the “coddling of civilization” and the “effete superstructure of urbanity.” It even is identical to a remark made by Rep. John P. Saylor that one appellant quoted for a different purpose:

The composite appeal of wilderness recreation is difficult to separate into component values. Results of questionnaires administered by summer recreationalists in several selected wilderness areas, however, suggests that response to wilderness can be considered in two general classes. The two strongest motivations of wilderness use is a wish to escape from the more onerous influences of a highly complex urban existence and the positive attraction of natural beauty. (Emphasis added)

Social scientists studying high-use wildernesses in close proximity to metropolitan areas also have viewed solitude as a relative term, contrasting the solitude of a heavily visited, urban-proximate wilderness area to the lack of solitude contained in an urban area.

[T]he high encounter levels at Snow Lake are nothing compared to those in the Seattle metropolitan area where most Snow Lake visitors come from. Even though Snow Lake

¹⁸ Cole, David N. and William E. Hammitt, “Wilderness Management Dilemmas: Fertile Ground for Wilderness Management Research, 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

¹⁹ Webster's Seventh New Collegiate Dictionary, G. & C. Merriam Co, 1971.

is a relatively crowded wilderness destination, it still provides a relatively high level of solitude for Seattle residents.²⁰ (Emphasis added)

Finally, Congress has demonstrated by their recent wilderness designations that being in sight and sound of a major city is not, in and of itself, an obstacle to wilderness designation. Sen. Frank Church, while speaking to the Endangered American Wilderness Act of 1977, specifically commented on the fact that being in sight and sound of Albuquerque did not prevent designation of the Sandia Mountain Wilderness.

While the Sandia Mountains were identified and reviewed by the Forest Service's RARE review in 1972-73, neither of the two roadless areas within the wilderness area was selected for further wilderness study, partly because of the previously discussed "sights and sounds" doctrine. Instead, the Forest Service developed plans to manage the area as a roadless "scenic area". Now, however, after much discussion and with the Administration's decision to abandon the "sights and sounds" doctrine, the Forest Service recommends immediate wilderness designation of the 30,930 acre area (including 370 acres of land which are being acquired by the Forest Service).²¹

It is inconceivable that Congress would think being in sight and sound of a major city would not violate solitude as expressed in the Wilderness Act, but meeting a handful of other wilderness hikers or climbers would.

Solitude is an important aspect of wilderness. The question is whether it must be the dominant factor in all reaches of the Mt. Hood Wilderness. The simple fact is that opportunities for solitude can and will exist in the Mt. Hood Wilderness if the Record of Decision is implemented. As the revised EA points out (pp. 66-69), most use of climbing routes, hiking trails and campsites in the three wildernesses occurs during peak season weekends when the weather is good. The EA also points out that, while many trails are heavily used, others are extremely infrequently used. Right now one could use all but one trail in the Salmon-Huckleberry Wilderness and three trails in the Hatfield Wilderness on peak season weekends and not see other hikers. Only three of 16 trails in these two wildernesses had any documented use during midweek. As an Oregon resident for more than 30 years, I know all too well that the state's frequently inclement weather is a major determining factor in whether one will encounter other wilderness visitors. Travel on a rainy or snowy weekend day, even on a popular trail, and one likely will encounter few others. One does not need an onerous and expensive limited entry permit system that would restrict recreational access to find solitude in the Mt. Hood Wilderness.

Appellants' Allegations: Use Management Areas will allow management based on what users "will accept" rather than by establishing and enforcing social conditions and standards. The only way to sufficiently protect the wilderness is to impose limitations on human visitation.

AAC Response: What users will accept seems, on the surface, to be much less definable than established standards and conditions. However, upon closer inspection, it quickly becomes clear how deceptive this allegation is.

The appellants focus solely on the social standard of human encounters as the basis for virtually all regulation of the Mt. Hood Wilderness. The thought appears to be that if one limits access, all other factors will resolve themselves through decreased human visitation. However, as was pointed out earlier in this letter, the human encounter standards that have been developed as a management tool to regulate solitude rely on norms developed by asking wilderness visitors how many encounters with other visitors they "prefer" or will "accept". The basic normative process occurs as follows:

²⁰ Cole, David N., et. al., "High-Use Destinations in Wilderness: Social and Biophysical Impacts, Visitor Responses, and Management Options, Forest Service Research Paper INT-RP-496, October 1997.

²¹ Sen. Frank Church testimony on Senate floor, October 20, 1977, *Congressional Record*, p. S17393.

Adapting these methods to outdoor recreation, visitors can be asked to evaluate alternative levels of potential impacts caused by increasing recreation use levels or changing types of recreation use. For example, visitors might be asked to rate the acceptability of encountering increasing numbers of recreation groups while hiking along trails. Resulting data would measure the personal crowding norm of each respondent. These data can then be aggregated to test for social crowding norms, or the degree to which norms are shared across groups such as first-time versus experienced hikers.²²

The norms developed for human encounters are then used to define the number of encounters that will be allowed in various Recreation Opportunity Spectrum classes throughout the wilderness. Since current demand for primitive recreation outpaces available supply of wilderness land under Alternative #2 – the appellants’ preferred alternative, though some appellants want even more restrictions on visitors – a rigid permitting system would be used to control visitation levels.

The appellants conveniently dismiss several drawbacks to the normative process used to develop encounter standards, including that encounter standards developed in one area for one particular recreational activity may be applied to a different recreational activity in another wilderness area. For example, much of the scientific literature focuses on encounter rates between hikers occurring in a forested wilderness setting. Are encounter standards for hikers in a forest necessarily appropriate to be applied to climbers on Mt. Hood where the climbing encounters will occur above timberline in open terrain lacking natural visual buffers? Two studies previously cited – Cole and Hammitt, as well as Hoss and Brunson – point out that norms and standards can be developed for issues that effectively are irrelevant to most wilderness visitors.

The recommendations of Hoss and Brunson are very much on point regarding this appeal, since they cautioned against imposing use limits to solve perceived crowding problems.

Decisions on how to allocate resources during LAC monitoring should be made in light of knowledge about how visitors cope with suboptimal impacts. In the absence of such information, managers may waste time and money attempting to maintain standards for impacts with which visitors can easily cope. Such standards may describe a condition that is ideal or desirable, but not necessary to visitors’ experiences. On the other hand, the condition might be necessary to some, but other visitors can adapt to violated standards on their own without management intervention. In this case, managers may find themselves creating an even less acceptable impact by taking a restrictive management action to restore conditions to within acceptable limits.²³ (Emphasis added)

In contrast to this very subjective process used to develop the human encounter standards that are the lynchpin of the appellants’ desired management approach, the standards and conditions established for the UMAs are based on more quantifiable, objective resource and social indicators. For example, use may be restricted in UMAs when “all the campsites at a UMA destination area boundary are full or nearly full during the peak season” (EA at p. 37). Use limitations may be placed on UMA trail corridors if managers begin noticing people establishing social trails, trampling vegetation at picnicking spots or by camping outside of designated sites, or similar situations.

The UMA focus on setting standards and conditions that focus more on the physical resource than on social factors follows an extensive body of scientific literature. For example, David Cole, et. al, remarked that:

²² Manning, Robert E. and David W. Lime, “Defining and Managing the Quality of Wilderness Recreation Experiences, 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

²³ Hoss, Amy F. and Mark W. Brunson, “Meanings and Implications of Acceptability Judgments for Wilderness Use Impacts,” 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

[E]ven though recreation impacts may not severely disrupt wilderness ecosystems at large scales (watersheds and landscapes), locally severe disturbances detract substantially from the quality of visitors' experiences, violating the intent of the Wilderness Act to keep human imprint "substantially unnoticeable." Second, physical impacts are more of a concern to visitors to these high-use destinations than the number of other visitors they encounter. Together these conclusions suggest that the emphasis of management should be on efforts to reduce the physical impacts of high visitation. Perhaps, if the physical effects of high visitation can be mitigated, large numbers of visitors and resultant high encounter levels are acceptable.²⁴ (Emphasis added)

Hoss and Brunson noted a similar phenomenon among the people in their study who found both social and environmental impacts "unacceptable" (representing only 13 percent of the total sample). They commented:

Although both social and environmental impacts were more commonly viewed as unacceptable, environmental impacts were more commonly viewed as unacceptable. In addition, respondents appeared to have lower thresholds for encounters with environmental impacts than for social impacts; that is, people were more likely to judge impacts such as litter, tree carving, or fire rings as unacceptable after just a few encounters, while more encounters were required for social impacts to reach unacceptable levels.²⁵ (Emphasis added)

Contrary to the concerns expressed by the appellants, managing wilderness based on human encounter standards actually involves use of more subjective criteria than Supervisor Larsen's Record of Decision, which focuses management of the wilderness as a whole, but especially the high-use UMAs, largely on objective, resource-based criteria. The management protocols contained in the Record of Decision conform to current scientific findings and are in use in other wilderness areas throughout the country. Finding for the appellants actually will cause grave damage to the physical resource since the agency will be involved in imposing a limited entry permitting system and will have no resources to devote to actual resource enhancement and protection activities.

Appellants' Argument: Failure to regulate based on human encounters will effectively "undesignate" large tracts of the Mt. Hood Wilderness and turn it into a *de facto* recreation area.

AAC Response: As the appellants well know, the Wilderness Act contains more defining characteristics of wilderness than just solitude. Even if one accepts, which we do not, that solitude must exist in all areas of the wilderness simultaneously and that solitude is defined by the number of human encounters experienced, failing to regulate for human encounters does not mean that wilderness lands somehow have been turned into "recreation areas" as the appellants claim.

Section 4(c) of the Wilderness Act contains a listing of uses that are prohibited in wilderness, though they usually are allowed on non-wilderness lands, including: permanent and temporary roads, use of motor vehicles, motorized equipment, and motorboats, landing of aircraft, mechanical equipment, structures and installations, and commercial enterprises. All of these uses would continue to be prohibited in the Mt. Hood Wilderness even if use limits on visitation are not imposed.

36 CFR 294.1 allows the Forest Service to establish areas managed primarily for public recreation. As the regulation indicates, these recreation areas are "suitable areas of national forest land, other than wilderness

²⁴ Cole, David N., et. al., "High-Use Destinations in Wilderness: Social and Biophysical Impacts, Visitor Responses, and Management Options, Forest Service Research Paper INT-RP-496, October 1997.

²⁵ Hoss, Amy F. and Mark W. Brunson, "Meanings and Implications of Acceptability Judgments for Wilderness Use Impacts," 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

or wild areas” that “should be managed for public recreation requiring development and substantial improvements.” (Emphasis added) Specifically mentioned as structures and installations allowed in recreation areas include the following:

campgrounds, picnic grounds, organization camps, resorts, public service sites (such as for restaurants, filling stations, stores, horse and boat liveries, garages, and similar types of public service accommodations), bathing beaches, winter sports areas, lodges, and similar facilities and appurtenant structures needed by the public to enjoy the recreational resources of the national forests.

None of these facilities listed above falls within the allowable structures and installations permitted by Section 4(c) of the Wilderness Act. The appellants’ accusations are not grounded in fact and should be discarded as irrelevant and unsubstantiated.

Appellants’ Allegations: Wilderness lands are owned by all Americans, so the Record of Decision is in error by giving local wilderness users too much influence in determining “acceptable conditions.” The fact that the Portland metropolitan area is growing is not sufficient reason to manage the Mt. Hood Wilderness differently than remote wildernesses.

AAC Response: The appellants discount the overwhelming opposition to harsh visitation limits expressed during the public comment period to the initial EA. They would have you believe that local wilderness visitors should have no say in managing wilderness near them. They seem to imply that all wilderness management policies and procedures should be uniform throughout the nation, so that wilderness areas near large and growing population centers should be managed identically to the most remote wilderness areas in Alaska or Montana.

It is important to recall that wilderness areas frequently were preserved through the work of local residents who toiled for many years to get these areas protected from resource extraction, development, and other impacts that would have changed forever their wild characteristics. The hikers, climbers, equestrians, bird-watchers, and other non-motorized recreationalists who fought for wilderness designation and who have and continue to donate their labor for volunteer projects should have more say regarding how an adjacent wilderness area is managed than the person on the other side of the continent who is content “just knowing it exists,” as the appellants suggest. Local areas must be managed with an eye to local conditions and local needs.

The uniform management approach to wilderness that the appellants recommend also flies in the face of repeated Congressional designations of wilderness located near rapidly growing urban areas. In 1977, Congress passed the Endangered American Wilderness Act, which, among other things, designated the Sandia Mountain Wilderness in New Mexico. In addition to Sen. Church’s remarks listed previously, House and Senate committees specifically focused on the need to designate this wilderness, and the Lone Peak Wilderness close to Salt Lake City, because they would be readily accessible to these population centers.

The committee feels that this 30,930-acre area, along with the Lone Peak proposal near Salt Lake City, will constitute an especially important addition to the Wilderness System in that it is so readily accessible to the residents and visitors of a large metropolitan area. The “sights and sounds” of nearby Albuquerque, formerly considered a bar to wilderness designation by the Forest Service, should, on the contrary, heighten the public’s awareness and appreciation of the areas’ outstanding wilderness values.²⁶ (Emphasis added)

²⁶ House Committee on Interior and Insular Affairs, Report 95-540, “Designating Certain Endangered Public Lands for Preservation as Wilderness, Providing for the Study of Additional Endangered Public Lands for such Designation, Furthering the Purposes of the Wilderness Act of 1964, and for Other

A year later Congress designated the Indian Peaks Wilderness area in Colorado, located within a two-hour drive of metropolitan Denver. A report from the House Committee on Interior and Insular Affairs addressed two key issues: a) the scenic and recreational qualities warranting wilderness designation, and b) the lack of need to have limited human encounters in these urban-proximate wilderness areas.

Despite the explosive growth which has occurred in the greater Denver area during the last several decades, the Indian Peaks still retain their primeval wilderness qualities containing undeveloped lands of outstanding scenic value, glaciers, numerous pristine streams and lakes, and alpine terrain and vegetation. As such, the area has become increasingly popular for those seeking a nearby wilderness experience, and represents an outstanding opportunity for Congress to further its goal of protecting wilderness values and establishing wilderness areas in close proximity to major population centers. As with the Sandia Mountain, Lone Peak and Pusch Ridge Wilderness Areas, which form the scenic backdrops for Albuquerque, N. Mex., Salt Lake City, Utah, and Tucson, Ariz., respectively, and were designated wilderness by the 95th Congress, the Indian Peaks area promises to afford a nearby high quality wilderness experience for many urban residents...

The committee recognizes that the restriction of visitors through the use of permit systems, establishment of designated camping sites, prohibition on open fires or gathering of firewood, and other methods, has been necessary in wilderness areas which receive very high public use. This does not mean, however, that visitation to popular wilderness areas should be restricted solely for the purpose of insuring that visitors to the area will not encounter other human beings. Any such interpretation of the Wilderness Act would run directly counter to Congress recent actions (as expressed in the establishment of such wilderness areas as the Sandia Mountain Wilderness near Albuquerque, N. Mex., the Lone Peak Wilderness near Salt Lake City, Utah, the Pusch Ridge Wilderness above Tucson, Ariz., and the Alpine Lakes Wilderness near Seattle, Wash.) designating wilderness areas in close proximity to major metropolitan areas so as to provide a nearby wilderness experience and opportunity for primitive recreation for many Americans.²⁷ (Emphasis added)

When Congress passed the Arizona Wilderness Act of 1984, a House Committee report specifically addressed the then-current high use of one wilderness area close to the rapidly growing Phoenix metropolitan area. It did so not by restricting access to the existing wilderness area, but by establishing a second wilderness area.

Four Peaks is situated just 35 miles east of Phoenix and directly north across the Salt River from the existing Superstition Wilderness, which is beset by its excessive popularity with Phoenix outdoor enthusiasts. The combination of these two wilderness units not only will serve to alleviate the pressure on the Superstitions, but also will provide burgeoning Phoenix with one of the most outstanding recreational resources in the nation, and right on its doorstep.²⁸ (Emphasis added)

Purposes,” July 27, 1977, p. 12. Identical language contained in Senate Committee on Energy and Natural Resources, Report 95-490, “Endangered American Wilderness Act of 1977,” October 11, 1977, p. 14.

²⁷ House Committee on Interior and Insular Affairs Report 95-1460, “Creating the Indian Peaks Wilderness Area and the Arapaho National Recreation Area and to Authorize the Secretary of the Interior to Study the Feasibility of Revising the Boundaries of the Rocky Mountain National Park,” August 9, 1978.

²⁸ House Committee on Interior and Insular Affairs, Report 98-643, “Designating Certain National Forest Lands in the State of Arizona as Wilderness, And for other Purposes,” March 30, 1984, p. 11.

From these three wilderness designation bills, it is quite clear that the volume of visitation is not a concern to Congress, nor is the proximity or influence of a nearby city. One would think that if existing wilderness areas were beset by “excessive popularity” from outdoor recreationalists that threatened Congressionally mandated solitude, Congress would take action to limit visitation rather than simply establish additional wilderness areas. Yet Congress chose not to do this. Congress repeatedly designated lands as wilderness in close proximity to major cities so that the local residents would have undeveloped places in which to see nature in its natural state, and as locations for primitive and unconfined recreational activities. Far from presenting a problem, Congress thought this proximity to the urban area would serve to “heighten the public’s awareness and appreciation” of the wilderness.

Social scientists also have found that the expectations of visitors to wilderness in close proximity to urban areas are different than for those who visit remote wilderness. In a recently released report, Amy Hoss and Mark Brunson studied visitors’ experiences at nine wildernesses in Utah, Wyoming, and California, some remote and some near a metropolitan area. They found that people visiting urban-proximate wilderness areas either utilized a conditional acceptance process of rationalization, remediative action and micro-level displacement to deal with suboptimal social conditions they experienced, or they were not bothered by sub-optimal social conditions. This differed markedly from visitors to remote wilderness.

The wildernesses chosen for this study differed in terms of their size, distance from urban areas, geographic location in the West, and administering agency (BLM or Forest Service). Of these variables, only urban-proximity was found to have an association with acceptability judgments. Visitors to urban-proximate wilderness were more likely to say they would continue to visit the area despite suboptimal conditions, and they also were slightly more likely to express unconditional acceptance of conditions they encountered.²⁹ (Emphasis added)

In light of the many comments from Congress, extensive social science research, and the overwhelming response from local residents, Supervisor Larsen’s plan is correct. Urban-proximate wilderness areas should not be held to the same social standards as distant wildernesses. It is fully defensible that the Record of Decision focuses on preventing physical resource degradation, while being more tolerant about social encounter standards in some currently high-use areas. This is consistent with what the public wants and what Congress has directed. It is important to emphasize, however, that the Record of Decision contains use restrictions in the current low-use areas that are designed to limit human encounters, and even in the high-use UMAs, use will be limited if the physical resource begins to suffer impacts.

Appellants’ Argument: Use of volunteer wilderness stewards and physical resource mitigation efforts would be “heavy handed” to the wilderness and wilderness visitors. Appellants express that these tactics would constitute “trammeling” the wilderness.

AAC Response: Appellants argue that many of the mechanisms included in the Record of Decision to mitigate past resource damage and to prevent future damage would involve “very heavy handed (and very expensive) user control actions,” as well as be intrusive to wilderness visitors. One appellant described in its appeal filing:

On-site regulation at popular destinations will include being watched, approached, and lectured by volunteer wilderness stewards who will be stationed at the sites, the presence of toilets, trail barriers to guide traffic, and picnicking, camping, or perhaps even simply sitting only in designated sites.³⁰

²⁹ Hoss, Amy F. and Mark W. Brunson, “Meanings and Implications of Acceptability Judgments for Wilderness Use Impacts,” 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

³⁰ Wilderness Watch appeal at p. 15.

Far from being heavy handed, use of volunteer stewards is fully consistent with Forest Service wilderness regulations. Forest Service policy manual #2323.12(2) states that the agency should “use information, interpretation, and education as the primary tools for management of wilderness visitors.” Volunteer wilderness stewards discussing Leave No Trace wilderness practices, answering questions from wilderness visitors, and ensuring that recreationalists are following established rules (e.g. dogs on leashes, camping in designated sites, possessing valid permits where required) would seem to fall well within this policy guideline.

Use of volunteer stewards is a long-standing and well-established program in numerous wilderness areas throughout the country – particularly at heavily used wildernesses near major metropolitan areas. Two professional colleagues of mine have spent summers working as volunteer rangers in the Indian Peaks Wilderness in Colorado. In this capacity they stopped and talked to wilderness visitors, discussed wilderness policies, occasionally administered wilderness use questionnaires, and ensured that overnight visitors had the necessary permits for overnight stays during peak season. Neither one commented that these visitor encounters were confrontational or viewed as invasive by the wilderness visitors they encountered. (Having been approached by volunteer stewards in the same wilderness area, I certainly did not find them heavy handed either.) They noted that many visitors sought them out to answer wilderness-related questions, and that these encounters gave them a great opportunity to discuss why certain conservation rules were in force. Fine and enforcement authority was not given to these stewards, but was retained by Forest Service personnel.

Volunteer wilderness stewards will play a vital role in combating a major source of damage to the environment. As Leung and Marion note in their state of knowledge report on environmental impacts:

Many impacts are avoidable, often caused by uninformed or careless behavior (Lucas 1982). Managers can educate and regulate visitors to avoid or reduce visitor behavior that contributes to avoidable impacts... The most common avoidable resource impacts include littering, cutting switchbacks, creating new trails and campsites, trail widening and campsite expansion, moving or building new fire sites, improper disposal of human and food waste, wildlife and cultural resource disturbance and cutting trees or tree limbs.³¹ (Emphasis added)

Most perplexing is the assessment that volunteer remediation and visitor contact efforts will be “expensive”. Cash- and personnel-strapped land management agencies are aggressively forging public-private partnerships with interested non-profit outdoor and conservation organizations throughout the country to maximize their resources. For example, the Mazamas donated countless hours building the Mazama trail on Mt. Hood. The Colorado Fourteeners Initiative exists solely to organize volunteer restoration projects to mitigate past damage and protect against future damage on Colorado’s highest peaks. Both of these programs operate under the direction of the Forest Service. It seems curious that the appellants think these programs are costly when federal agencies are looking to them as a source of free labor to provide much needed management activities.

In what amounts to a perverse twisting of logic, the appellants characterize these volunteer stewards as “heavy handed” when their preferred management approach involves a mandatory limited entry permit scheme that would drastically curtail access to the wilderness, require wilderness visitors to obtain permits in advance, and pay fees. Given the tremendous use limits the appellants would seek to impose – current use of the popular South Route climb on Mt. Hood would be restricted by more than 90 percent in Alternative 2, which they view as insufficient – it is unlikely that any form of mandatory permitting system could be implemented without some form of advance reservation process due to the high demand. This would involve Forest Service staff time, the cost of printing application forms and permits, and significant

³¹ Leung, Yu-Fai and Jeffrey L. Marion, “Recreation Impacts and Management in Wilderness: A State-of-Knowledge Review,” 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

management expenditures to have staff in the field to enforce the permitting process since only Forest Service personnel may fine violators.

Recent social science research points out another factor that should give managers pause in terms of implementing a mandatory entry permit system combined with dramatically reduced visitation levels: displacement. The long-assumed theory of displacement held that those wilderness purists who most covet solitude would be displaced from high-use areas to very low-use areas as they search to find solitude. However, recent research conducted in three Oregon wilderness locations noted a significant displacement of people who were averse to the limited entry permit system. This form of displacement was more apparent and more pronounced than the conventional displacement of purists.

Between 1991 and 1997, many more people appear to have been displaced from Obsidian Falls by use limits than were displaced from Green and Marion Lakes by increasing use and/or deteriorating conditions resulting from lack of restriction.³²

The management implications of this newly discovered form of displacement are significant and must be acknowledged when “heavy handed” forms of management are implemented, as would occur if the appellants are successful in their appeal. As Hall and Cole remarked in their report:

Visitors should also be considered displaced if a place has become too lonely for their taste, if trails have disappeared, if use limits have forced them to go elsewhere, or if a restrictive management regime has driven them away. Moreover, referring to traditional displacement as inherently bad interjects the value judgment that visitors who need uncrowded conditions should be preferred over those who need unrestricted, free and spontaneous recreation opportunities.³³ (Emphasis added)

The displacement of users in an effort to reduce crowding within a given wilderness area also poses serious questions about whether the benefit in terms of reduced encounters is worth the societal cost in displacement to other areas and reduced opportunities to visit wilderness. As David Cole, et. al. remarked:

The costs of access denial depend on how many people are denied access and what they do when access is denied. Costs increase as more people are denied access. If they choose to visit other wilderness destinations, they may increase encounter levels and physical impact levels there as well. If they stay home, the costs are not borne by wilderness but by the visitors who are unable to exercise their recreational choices.

We do not attempt to objectively quantify the benefit-to-cost ratio of reducing use. We believe, however, that the benefits of even a 50 percent reduction in use at Snow Lake (3 additional minutes between encounters) is insignificant in comparison to the cost of denying access to thousands of visitors each year.³⁴ (Emphasis added)

Not only are the mandatory permitting scheme and use limits favored by the appellants “heavy handed,” they also violate Forest Service policy. Forest Service wilderness management policy #2323.12(1) directs that the agency:

³² Hall, Troy and David Cole, “An Expanded Perspective on Displacement: A Longitudinal Study of Visitors to Two Wildernesses in the Cascade Mountains of Oregon,” 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

³³ Hall, Troy and David Cole, “An Expanded Perspective on Displacement: A Longitudinal Study of Visitors to Two Wildernesses in the Cascade Mountains of Oregon,” 2000, presented at Wilderness Science in a Time of Change Conference, USFS.

³⁴ Cole, David N., et. al., “High-Use Destinations in Wilderness: Social and Biophysical Impacts, Visitor Responses, and Management Options, Forest Service Research Paper INT-RP-496, October 1997.

Maximize visitor freedom within the wilderness. Minimize direct controls and restrictions. Apply controls only when they are essential for protection of the wilderness resource and after indirect measures have failed. (Emphasis added)

Supervisor Larsen's Record of Decision seeks to utilize "indirect measures" such as physical resource mitigation efforts, use of volunteer stewards, and educational efforts to redress past environmental damage and to protect the resource from future harm before instituting any use limits and mandatory permits. Use limits do exist in the Record of Decision for primitive areas and in two UMA destinations. They will be instituted in other high-use destinations and corridors if physical resource damage begins to occur or if campsite capacities are reached. The Record of Decision clearly follows with established agency wilderness management policies and is supported by current social science research. If anyone is seeking to impose "heavy handed" management policies, it is the appellants, who are seeking to impose a policy that is not currently justified, violates agency policy, and would result in significant societal costs in terms of lost opportunities to visit wilderness.

Conclusion

When The American Alpine Club commented on the initial Environmental Assessment regarding management of the Mt. Hood Wilderness, we discussed the importance of solitude to wilderness. Our Task Force members uniformly felt that solitude was an important aspect of wilderness climbing and of wilderness in general. However, as our letter stated:

[T]he debate surrounded whether solitude exists currently on climbing routes and hiking trails, whether solitude levels must be uniform throughout all areas of wilderness, whether solitude must be enforced by a mandatory permit system (and fee) rather than through self-regulation, and the appropriateness of reducing solitude in one area by diminishing solitude in another.

Though we have concerns regarding the use of encounter standards as the definition of solitude and the need to have human encounters dictate recreational access in all parts of the wilderness, the AAC does not object to how these standards are used in the revised EA and in the Record of Decision. Use and maintenance of human encounters as a factor in managing low-use primitive areas may be justified as a way of ensuring more solitude exists in these areas relative to the high-use areas. From a perspective of promoting climber safety and reducing the potential for search and rescue missions, limitations on use for more remote, technical climbing routes make more sense than for use on the heavily frequented standard route. It also allows those individuals who merely want to experience the joy and wonderment of climbing a glaciated wilderness mountain to do so on a relatively safe and straightforward route, while leaving most of the other, more difficult climbing routes as primitive challenges for advanced mountaineers.

The Record of Decision also makes great strides towards mitigating the limited environmental degradation that has occurred over the decades, largely through an excess of campsites, proliferation of social trails, and trampling of high-use destination areas. Research shows that minor modifications can assist in constraining the extent of physical damage caused by recreational use, and the Record of Decision follows the best available science in this regard. The Record of Decision also follows Forest Service policy by seeking to first utilize education and necessary minor improvements before curtailing wilderness use. As the research points out, imposing limited entry permits as the sole management tool will do nothing to mitigate past resource damage or to protect against any future degradation of the environment. The management approach contained in Supervisor Larsen's Record of Decision will ensure that the tremendous scenic and natural resource values contained in these three wildernesses will remain viable for generations to come.

The AAC believes the two sets of appellants have not made a sufficient case to impose the drastic visitation limits and the burdensome limited entry permit system that are the cornerstones of their requests. The Record of Decision contains the best, most balanced approach to managing the Mt. Hood, Hatfield and

Salmon-Huckleberry wildernesses so that their many resource values are protected from overuse now and in the future. The Record of Decision appropriately manages use and preservation as is called for in the Wilderness Act itself. Unlike the relief requested by the appellants, however, the Record of Decision would allow Justice Douglas's great great grandsons (and great great granddaughters) "who do turn their faces to the peaks rather than to the playgrounds" to experience the tremendous benefits of appropriate wilderness-dependent recreation today and for generations to come.

Regards,

A handwritten signature in black ink, reading "Lloyd F. Athearn". The signature is written in a cursive, flowing style with a large initial "L".

LLOYD F. ATHEARN
DEPUTY DIRECTOR