



THE AMERICAN ALPINE CLUB

LLOYD F. ATHEARN

DEPUTY DIRECTOR

CHAIR, AAC POLICY TASK FORCE

March 26, 1999

Kathleen Walker
Zigzag Ranger District
70220 E. Highway 26
Zigzag OR 97049

Re: Comment on Wilderness Protection Environmental Assessment

Dear Ms. Walker,

The American Alpine Club, founded in 1902, is the oldest national organization representing the interests and concerns of American mountaineers and rock climbers. Our current national membership of 5,600 includes more than 700 in Oregon and Washington. Since its inception, the AAC has actively advocated on behalf of wilderness designation and expansion, as well as the protection and conservation of our mountain regions. With this in mind, I would like to respond to the issues contained in your recent draft Wilderness Protection Environmental Assessment for the Mount Hood, Hatfield and Salmon-Huckleberry Wildernesses. (Please note you likely will also receive comments from our Oregon Section.)

After a thorough review of the Wilderness Protection EA, the American Alpine Club has serious concerns about the alternatives contained in this report. Regretfully, we feel it necessary to advocate for Alternative #1 – the “No Action/Current Management” alternative – given the serious flaws contained in the agency’s “Proposed Action” (Alternative #2) and the “South Side Exception” (Alternative #3). We do this with great reluctance, since it would mean that some of the valuable physical resource protection issues raised in the EA would not be addressed. The lack of viable alternatives that do not address the “solitude” issue, however, leaves us no choice but to accept the current management alternative.

In many ways the Wilderness Protection EA seems to be misnamed, because little in the report discusses physical resource protection issues. The report indicates that climbing currently causes negligible environmental impact on the wilderness resource, and this impact is not expected to increase in the future. There is little in the report addressing environmental impacts caused by other wilderness users, including hikers and equestrians. Though the EA addresses some specific resource-based issues, including the location of campsites, introduction of noxious weeds, and approaches to fire management, the primary and overriding focus of the EA is the introduction of a permit system to address a perceived social problem – ensuring “solitude” by limiting human encounters.

While the EA contains elaborate spreadsheets showing how user visits could be dispersed throughout the wilderness to limit social encounters, there is no compelling argument made for regulating the wilderness based on solitude. The EA’s only justification for the use limits is the Wilderness Act’s definition of wilderness, which speaks to providing “opportunities for solitude or a primitive and unconfined type of recreation.” While the Act speaks to providing “*opportunities* for solitude” (emphasis added), note that it equally calls for providing opportunities for primitive recreation. The Act does not pit one objective against the other as the EA appears to do. Further, the EA does not provide the scientific justification supporting the human encounter rates proposed (i.e. why are 10 encounters chosen for semi-primitive trailed and

untrailed, six encounters for primitive trailed, and one encounter for primitive untrailed zones rather than higher or lower numbers of encounters?) Given that the citizens you consulted in the scoping process preferred not to limit access based on solitude, it seems the burden is on the agency to explain why these human encounter rates are necessary. Such a compelling case has not been made.

Although the American Alpine Club has objections to the way the EA proposes to regulate solitude in the Mount Hood National Forest, the members of our Policy Task Force felt solitude was an important wilderness resource issue. Almost without exception our members felt solitude tended to enhance a wilderness climbing experience. However, the 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.

The American Alpine Club believes the mandatory permitting system and use limits are not appropriate management policies for the following reasons:

- According to your EA, there has been little change in the number of people climbing Mount Hood since the turn of the century, and current and future climbing use does not pose significant environmental concerns. Therefore, it is hard to understand why this constant level of use – which predates the establishment of the Wilderness Act by many decades – now poses a threat to wilderness when it was not seen as an obstacle to establishing the Mount Hood Wilderness in 1964.
- Solitude exists already on most of Mount Hood’s climbing routes. The second most-climbed route on the mountain, Leuthold Couloir, sees only 10 climbers per weekend day, while most other routes see only one (or fewer) climbing teams. Even the high-use South Climb route enjoys solitude during the week.
- As the EA notes, the South Climb historically has had high use. By allowing high use on this one climbing route, it allows the majority of other climbing routes to enjoy solitude. Restricting use of the South Climb will increase solitude on that one route at the expense of all other climbing routes on the mountain.
- The EA correctly points out that shifting use from the South Climb to other routes likely will cause more accidents and rescues as people either climb in inclement weather (not a rarity on Mount Hood) when they have a permit, or move to a more technical route for which they may not be appropriately skilled or equipped.
- Imposing an advance permitting process and charging a fee will limit flexibility to take advantage of brief spells of good weather, and will increase the financial burden on people seeking to recreate in their public lands.
- Creating recreational opportunities outside of wilderness is not an option for mountaineers, as all the major peaks in Oregon and most in Washington are located in Forest Service or Park Service wilderness areas. Thus, imposition of solitude standards in wilderness areas eventually will cap the number of people who are allowed to climb the highest peaks in the Cascade Range.

In addition to these concerns with the solitude/human encounter provisions, there are a few specific concerns I would like to bring up regarding the EA:

- On page A8, the EA discusses the placement of “permanent climbing aids.” While this term is never defined, I can only conclude the EA is referring to fixed climbing anchors. Such a regulation is not appropriate given the attached memorandum from Acting Deputy Chief Gloria Manning indicating that no forests are to institute regulations on fixed climbing anchors until a national fixed anchor policy is developed through a negotiated rulemaking process. (As a practical matter, the volcanic rock

in most of the wilderness is too friable to allow secure placement of fixed climbing anchors, making such a prohibition unnecessary.)

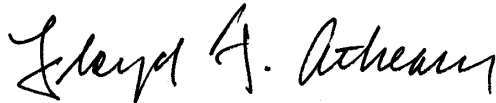
- The effective dates of the proposed regulations are confusing and do not conform to the different seasons for climbing use and hiking/equestrian use. Permit limits on Alternative #2 appear to be in force from May 15 to October 15, which would conform with the hiking and equestrian season, but would miss part of the climbing season. The limits for Alternative #3 appear to be in force from April 15 to July 4, which would conform more towards the climbing season, but would not make much sense for the longer hiking and equestrian season.

In conclusion, the American Alpine Club believes it may be most useful for the Forest Service to build on the research cited on page 38 of the EA that seeks to manage both social and environmental objectives. The three-pronged approach would allow existing high use to occur in current high-use areas (with the provision that human impacts are mitigated whenever possible, such as through the successful “blue bag” program for climber waste), manage current low-use areas in that state to preserve existing solitude and protect the physical resource from damage, and try to expand recreational opportunities outside of wilderness. Such a plan would acknowledge that the most popular wilderness destinations frequently draw large crowds because they have the most scenic views, are readily accessible, or both. People go there for reasons other than solitude.

Additionally, the Forest Service should consider presenting a broader range of possible management alternatives for consideration so that organizations and individuals would not be forced to advocate for no change simply because all other options have a common, but unacceptable, approach.

Thank you for the time you spent with me on the phone a few weeks ago, and also for your consideration of these comments. Do not hesitate to contact me if you have any questions or concerns.

Regards,

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

LLOYD F. ATHEARN
DEPUTY DIRECTOR
CHAIR, AAC POLICY TASK FORCE