

Comment on FSM 2355 Climbing Opportunities #ORMS-3524

I disagree with the proposed directives assessment that all climbing anchors located in designated wilderness areas be classified as prohibited installations pursuant to the Wilderness Act section 4(c). The requirement of a Minimum Requirement Analysis (MRA) would negatively impact visitors access to unconfined recreation, result in adverse environmental impacts, and result in unsafe climbing practices in wilderness areas. In addition, Forest Service offices do not have adequate staffing to properly perform the minimum requirements analysis at the scale necessary to administer climbing resources on Forest Service lands.

The proposed directive section 2355.32 – *Placement, Replacement, and Retention of Fixed Anchors and Fixed Equipment in Congressionally Designated Wilderness* states:

“2. Determine whether placement or replacement of fixed anchors and fixed equipment in wilderness is the minimum necessary for administration of the area for Wilderness Act purposes by conducting a Minimum Requirements Analysis. The determination must include an analysis of whether placement or replacement of fixed anchors and fixed equipment is the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. The determination must explain how and why the conclusions in the analysis were reached.”

The classification of fixed anchors and fixed equipment as prohibited installations will negatively impact wilderness recreation access and will not improve wilderness character. The requirement of a MRA on a “case-specific determination” will result in an undue administrative burden on Forest Service employees while reducing safe access to public lands. Local Forest Service offices do not possess adequate staffing to perform a MRA for every proposed climbing route or anchor located within wilderness areas. The result will be an administrative delay in processing MRA requests directly resulting in decreased climbing access in wilderness and unsafe climbing practices. Proposed Forest Service Manual section 2355.32 should be removed or rewritten and any references to Minimum Requirements Analysis should be removed from the proposed directives.

Fixed equipment and fixed anchors in wilderness areas facilitate safe use by visitors and contribute to local economies. In Bishop, California, many of our most iconic rock-climbing areas are located within Wilderness. Pine Creek Canyon and Cardinal Pinnacle are both located in the John Muir Wilderness. These areas use bolts and fixed bolted anchors to allow for safe passage up the rock walls. On granite slab terrain, the use of bolts is necessary to protect the long distances between areas of natural protection. Fixed anchors for belay and descent reduce impacts to wilderness character. On climbs without fixed bolted anchors natural anchors such as rocks or trees are used for descent. When tree or shrub anchors are used is often results in negative impacts to the vegetation and heightened mortality. Using slings or cordalette on natural anchors, such as trees, shrubs, or rock horns, often results in a “bird’s nest” of old material, resulting in visual impacts to wilderness. These anchors are also less safe than bolted fixed anchors.

We have many structures and improvements in designated wilderness areas that are not considered prohibited installations. Trail systems are ubiquitous in wilderness areas, as are associated trail structures such as bridges, boardwalks, and drainage structures. The Forest Service does not perform a Minimum Requirements Analysis every time it installs a log bridge or a waterbar. Requiring a MRA for every bolt or fixed anchor would be detrimental to climbers participating in unconfined recreation in wilderness areas. A more common-sense solution that would preserve wilderness character

and climbing access would be to ban power drills and require hand drilled holes to be used for bolt installation.

The Wilderness Act states that wilderness be managed to provide “outstanding opportunities for solitude or a primitive and unconfined type of recreation”. Climbers and mountaineers come to the mountains and cliffs to immerse themselves in nature and test themselves against the natural world. The act of scaling rock walls is by its very nature primitive and unconfined. Rock climbing and mountaineering and the use of fixed equipment to climb precedes the Wilderness Act and subsequent Wilderness designations. The use of fixed anchors and bolts is necessary in wilderness areas to facilitate safe and environmentally responsible use of wilderness climbing areas. I disagree with the proposed directives assessment that all climbing anchors in wilderness areas be classified as prohibited installations.

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