

Comments regarding: FSM 2355 Climbing Opportunities #ORMS-3524

Following a review of this draft document, it is immediately apparent there is a biased agency view on what is an acceptable “installation” within a statutorily designated federal wilderness area. Consider the reality that the construction of recreational trails and installation of trail signs also constitute permanent “installations.” The public openly recognizes that these are acceptable impacts for the greater good and to enhance public safety. Concentrating use on established trails prevents the development of social trails and needless widespread impact to the natural environment. Trail signs minimize recreational users getting lost and therefore serve as a preventive search and rescue strategy which increases public safety. The formal minimum requirement analysis process is quite obviously not equally applied to these agency administrative “installations.”

“2355.03 – Policy 5. The placement, replacement and retention of fixed anchors and fixed equipment are permissible in wilderness when it is determined that they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. Existing fixed anchors and fixed equipment may be retained pending completion of a Minimum Requirements Analysis, as funding and resources allow, to determine whether they are the minimum necessary for administration of the area for Wilderness Act purposes (FSM 2355.32)

The installation of bolts for climbing or other recreational activities is in reality a minor impact and meets the Wilderness Act characterization of *“the imprint of man’s work substantially unnoticeable.”* Unless a recreational user is directly at or within the immediate vicinity of a rock face, the visual presence of a climbing bolt on a rock face is in reality “substantially unnoticeable.”

“2355.03 – Policy 7. the Forest Service will allow the placement or replacement of fixed anchors and fixed equipment for emergency operations by climbers, the Forest Service, or other Federal, State, or local governmental personnel.”

The inclusion of this statement is applauded for the foresight of the agency toward critical public safety activities that may require the installation of bolts. However, it is suggested that this sentence and list of involved entities be modified to specifically also include the much more precise terminology of “search and rescue efforts.”

Fixed bolt anchors are a safety installation that also provides for the safety of recreational users and reduces the detrimental impact on natural vegetation that would otherwise be utilized for anchor systems through the slinging of webbing. A collection of tattered nylon slings left behind on a tree can be more unsightly than a couple of bolts, particularly if the bolt hangers are of a color that closely matches the background environment. Vegetation at the edge of a cliff may be supported by a shallow root system and repetitive rappelling from such an anchor can hasten the demise of a small tree or brush.

Climbing bolts have been allowed in the wilderness before the Wilderness Act existed, and were largely allowed in wilderness areas after the creation of the Wilderness Act. Overall, the majority of wilderness users view the sparing use of bolts (hand drilled) as an acceptable practice to protect otherwise unprotectable or dangerous climbing in a wilderness area.

I applaud the USFS for recognizing that *“Climbing is an appropriate use of NFS lands when conducted in accordance with applicable law and Forest Service directives and consistent with the applicable land management plan and climbing management plan.”*

Respectfully submitted,

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