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First name: Gary

Last name: Milner

Organization:

Title:

Comments: FSM 2355 Climbing Opportunities #ORMS-3524

Peter Mali January 28, 2024

National Wilderness Program Manager

1400 Independence Avenue SW

Washington, DC 20250-1124

I live in the Bitterroot valley in Montana. I've been involved with the Mill Creek climbing issue on the Bitterroot National Forest from the beginning. This issue went national and became a heated source of user conflict and resource damage. When climbers installed over 500 bolts in a Recommended Wilderness area, I felt I needed to become involved. That area has essentially become a heavily impacted sport climbing gym.

I'm not anti-climbing, however, the unchecked damage and potential damage these folks have caused needs to be addressed and regulated. Other local, state, and federal land management agencies have for many years seen the need to manage the installation of fixed hardware. I'm glad the Forest Service now understands the need.

I was amazed at what sport climbers were doing to the area with seemingly no knowledge of potential damage to cultural sites, cliff dwelling species, or other users. I've personally found numerous sites of cached climbing gear, seen graffiti written on cliffs in chalk, documented sport climbers installing bolts near eagle nests, seen eroded user created climbing trails, and more. It's been well documented and presented to the Bitterroot National Forest as well as the access fund. The access fund, while talking a good line regarding resource protection, seemed to turn a blind eye to this behavior. Self-policing clearly is not working. The on the ground impacts from the industry of sport climbing is the reason why across the country agencies are now managing the installation of fixed hardware.

Comments to Proposal

2355.03

Develop a climbing management plan covering each administrative unit or ranger district that has one or more climbing opportunities, as required and as funding and resources allow.

A Climbing Management Plan (CMP) is required however the proposed language does not prioritize funding. Will sport climbers simply be allowed to install fixed hardware wherever they want until funding occurs for a CMP? To prevent damage to cultural sites, natural resources, and avoid user conflicts, it's appropriate that a moratorium be placed on the installation of fixed hardware on lands managed by the USFS that have one or more climbing opportunities until funds are allocated to develop a CMP for the area in question. One can count on a mad rush to install bolts before CMPs are in place.

A moratorium does not require funding, does not prevent climbing, and does not require planning resources. It does however help prevent damage to culture sites, cliff dwelling species, and avoids user conflicts while still allowing climbing on existing installed fixed anchors.

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)

Installing bolts in Wilderness areas to facilitate climbing is the opposite of "primitive or unconfined recreation". Recommended Wilderness and Wilderness Study Areas should be included. Clean, traditional climbing using removable equipment more closely aligns with primitive recreation and that form of climbing has a long history in Wilderness.

There are 1000's of climbing opportunities outside of Wilderness. There is no loss of opportunities in not allowing permanent fixed hardware installations in Wilderness.

Finally, I do not expect the Forest Service to specifically build bridges so I can cross streams easier, or clear trails so I can hike easier or to "facilitate" my experience. By allowing permanent fixed hardware in Wilderness, the FS appears to be promoting sport climbing over other types of recreation. Why should sport climbers be allowed this special privilege? Leave No Trace should mean not leaving permanently installed fixed hardware. There will be climbers generations from now who will appreciate the opportunity to climb without installed bolts.

(6) b. The placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act, but the establishment of bolt-intensive climbing opportunities may be incompatible with the preservation of wilderness character [emphasis added].

The establishment of bolt-intensive climbing opportunities is incompatible with the preservation of wilderness character. The access fund in their comments to the Salmon-Challis National Forest - February 2019 and to the Manti-La Sal National Forest - April 2017 seem to agree that bolt intensive areas are incompatible with Wilderness and Wilderness designation. Quoting from their comments (they used the same wording in each comment and only changed the name of the specific Forest); "We believe that the well-developed and existing climbing areas in Manti-La Sal National Forest (and Salmon-Challis National Forest) are "substantially noticeable" developed recreation sites and should be thereby be excluded from wilderness recommendations in order to prevent undesirable future management issues". If the leading climbing advocacy group comments that bolt intensive climbing opportunities are inconsistent with Wilderness, the Forest Service should respect that. The thought that the Forest Service even suggests that bolt intensive areas could be compatible with Wilderness is disappointing.

7) Forest Service personnel are not responsible for the placement or replacement, or assessing or ensuring the safety, of fixed anchors and fixed equipment on NFS lands.

The Forest Service may state that the agency is not responsible for any aspect of fixed anchors or fixed equipment. However, if the Forest Service creates directives that provide for the installation of fixed hardware but does not ensure public safety, one can certainly expect law suits against the Forest Service.

It's also pertinent to ask the Forest Service for clarification on ownership of fixed hardware. If a private citizen installs fixed anchors, it seems just as acceptable for another person to remove them.

(13) Promote stewardship opportunities and collaboration between the Forest Service and climbing organizations.

The directive does not mention other stake holders. Is the Forest Service excluding other stake holders? This is not just about climbing organizations. Other groups and tribes should be included. They could help with monitoring for peregrines, eagles, mountain goats, and other cliff dwelling species. Stewardship and collaboration participation should not provide decisional influence or material gain to participants, given these are public lands. Local, regional, and national environmental, tribal, and wildlife groups should be included. Including all interested parties, not just climbing groups, would promote mutual trust and respect.

2355.38 Compliance with Natural and Cultural Resource Laws (1) NEPA - Climbing management plans that contain restrictions or prohibitions are more likely to require NEPA analysis than plans that provide only implementation guidance or technical information.

This section seems to imply that funding will not be available for any type of restrictions or prohibitions. The proposal makes it clear of the intention to increase climbing use which will significantly increase the existing and emerging resource issues and user conflicts. It is precisely these issues that require prohibition and/or restrictions. The Forest Service is encouraging use but turning a blind eye to the consequences of that use and abuse.

(3) Restrict the placement and replacement of fixed anchors and fixed equipment to established climbing opportunities and to approved new climbing opportunities that have been evaluated for natural and cultural resource impacts.

Until climbing areas and specific routes - existing, emerging or proposed - have been both inventoried and evaluated, there should be no new fixed climbing installations. If an area has been evaluated for natural and cultural resources, how will the Forest Service monitor the number of bolts/fixed hardware installed? Will sport climbers be able to install as many bolts as they wish?

I applaud the Forest Service for seeing the need for an area to be evaluated for natural and cultural resource impacts. It should be made clear exactly how an area is "approved". The Bitterroot climbing controversy would have been avoided if an approval process had been in place.

(4) Existing fixed anchors and fixed equipment may be used without restriction when consistent with the applicable climbing management plan, except in areas closed to climbing.

This allows all existing fixed anchors or equipment to remain in use until some non-funded future CMP is completed, even if resource issues are occurring. Allowing existing fixed anchors and equipment to be used without restriction does nothing to address significant existing and emerging resource issues and use conflicts that have resulted from the explosion of this sport. Authorize Forest Supervisors to reduce, temporarily close, or prohibit climbing in their administrative unit when monitoring shows that it is directly causing, or will likely directly cause, adverse effects.

#### General Comments

The directive talks of "climbing opportunities that serve visitor needs". Sport climbing, using installed fixed hardware, is not a need. It should not be perceived as such.

Safety is often mentioned regarding the installation of fixed hardware. Discretion, proper judgement, and humility are what ensures safety. There is no need to make all climbs climbable for every skill level. Future generations of climbers will appreciate the opportunity to climb cleanly without the need for permanent bolts and hardware.

I was involved from the beginning with a collaborative effort regarding sport climbing on the Bitterroot National Forest. It became clear there are many different views on bolts/hardware from climbers. Some climbers value clean, traditional climbing and are opposed to permanent bolts/hardware in general and especially in Wilderness.

Other climbers seem to feel they can install bolts/hardware wherever they desire under any circumstances. Folks who wanted some restrictions or an authorization system were viewed as "anti-climbing" which is not the case. That climbers installed over 500 bolts in a Recommended Wilderness Area, with no knowledge of cultural sites, raptor nests, or recognizing they were in Recommended Wilderness is prime example of the need for regulation.

I recreate on Forest Service and other public lands. I need permits to collect fire wood, cut a Christmas tree, pick mushrooms, collect rock samples, float certain rivers, to hunt, and to fish. None of these permits are burdensome to me. An authorization process helps educate me on issues, provides guidance to be light on the land, and helps the Forest Service (or other agency) manage use. Why do I and other users need a permit for our activities but those climbers who install and permanently leave bolts and hardware do not? It seems inconsistent and discriminatory to certain user groups.

I believe sport climbing can exist on Forest Service lands; however, the permanent installation of bolts/hardware should require an authorization/permit system. A permit system is standard across the country. An authorization system is a perfect means to promote education and ethics (please see the attached Bitterroot National Forest LNT Climbing Brochure). Without an authorization system in place there will be those climbers who will install bolts wherever they want, regardless of the impacts.

An inventory of all climbing vertical trails/routes, access routes, and infrastructure facilities associated with climbing is needed. Its unclear to me how the Forest Service will manage for current and future conditions if an inventory is not completed.

It is unclear from the directive just how effective collaboration was with tribal groups. While many climbers seem respectful of cultural sites, I hope the Forest Service decision makers are aware that the access fund sued the United States Department of Agriculture when the Forest Service banned climbing at Cave Rock in Nevada. The access fund claimed the Forest Service was discriminating against climbers, that the Forest Service was promoting one religion over another, and that bolts did not harm the rock. The access fund lost on all three of those points. (Access Fund v. United States Department of Agriculture. No. 05-15585.)

The installation of bolts and other permanent hardware can be appropriate in some areas. Wilderness, Wilderness Study Areas, and Recommended Wilderness Areas should be off limits to permanently installed bolts and hardware. They are counter to the true spirit of Wilderness.

An authorization/permit system should be used to manage the installation of bolts and fixed hardware on lands managed by the Forest Service.

An inventory of all climbing vertical trail/routes (including number of bolts) should be conducted on each forest before authorizing the installation of new fixed hardware.

Until funds are available for inventories, and until cultural and natural resource analysis are conducted, a moratorium on the installation of new fixed hardware should be in place on all lands managed by the Forest Service.

I would like to conclude with two quotes.

"Writing this last chapter has been difficult and painful. It involves do's and don'ts, obligations and responsibilities. Most climbers are individuals who love freedom-they climb because it makes them feel free. We may expect then, that having others suggest how they ought to climb will rub wrong. There used to be so few climbers that it didn't matter where one drove a piton, there wasn't a worry about demolishing the rock. Now things are different. There are so many of us, and there will be more. A simple equation exists between freedom and numbers: the more people the less freedom. If we are to retain the beauties of the sport, the fine edge, the

challenge, we must consider our style of climbing; and if we are not to mutilate and destroy the routes, we must eliminate the heavy-handed use of pitons and bolts". Royal Robbins, Basic Rock Craft, 1977

"The golden age of bolting totally under the radar is coming to an end". Access Fund. Vertical Times Spring 2013

Thank you for considering my comments and concerns.

Sincerely,  
Gary Milner  
P.O. Box 961  
Corvallis, MT 59828