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First name: Dane

Last name: Scott

Organization:

Title:

Comments:

Re: FSM 2355 Climbing Opportunities #ORMS-3424

The Western Montana Climbers' Coalition (WMTCC) is composed of nearly 300 recreational rock climbers who reside in the Bitterroot and Missoula valleys of Western Montana. The seven-member WMTCC board requests that the United States Forest Service and National Park Service reconsider the proposed guidelines for managing fixed anchors in wilderness. We strongly urge the USFS and NPS to explore a more balanced and safer approach to managing the historic practice of adventure rock climbing in wilderness. We fully acknowledge that directions should be given for climbers to exercise humility, restraint and respect in the use of fixed anchors in wilderness. However, the Minimum Required Analysis was not designed to manage this essential piece of safety equipment. Many problems will arise if it is used for this purpose. We would like to emphasize two such problems:

The use of MRA to manage fixed anchors is unbalanced and restrictive. It erodes wilderness character by unnecessarily restricting opportunities for a growing number of Americans seeking authentic wilderness experiences through adventure climbing.

The use of MRA raises serious safety concerns for climbers by requiring wilderness managers to make critical safety decisions without the necessary guidance, expertise and information to make such decisions.

Wilderness character is a multi-dimensional concept, and wilderness management requires a holistic approach involving balancing trade-offs. The USFS and NPS also place a high priority on the safety of users. We urge the USFS and NPS to develop more balanced and safer alternatives than the MRA to manage fixed anchors in wilderness. More specifically, we encourage the USFS and NPS to reconsider the majority recommendations of the USFS's 2003 Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee and NPS's Director's Order #41, 7.2. Adventure climbing, which has long included the occasional use of fixed anchors, is a historic and legitimate wilderness activity. The ideological, absolutist view that the occasional use of fixed anchors in-itself erodes wilderness character is incorrect. Rather, it is the unguided, overuse and misuse of this essential safety equipment that would erode wilderness character. The more nuanced interpretation of the role of fixed anchors found in DO #41, 7.2 understands this reality. The order states: "The occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act." This interpretation of fixed anchors provides a more reasonable, and less ideological, starting point for developing a balanced, flexible and safer approach for managing fixed anchors in wilderness.

The use of the MRA would unnecessarily restrict wilderness climbing opportunities by placing heavy bureaucratic burdens on wilderness managers and climbers. The current approach lacks balance by overemphasizing possible impacts of fixed anchors on one dimension of wilderness character, perhaps "undeveloped," at the expense of another dimension, "outstanding opportunities for solitude or a primitive and unconfined type of recreation." In a USFS publication on wilderness management, Peter Landres, and his coauthors, observe that wilderness character is not absolute, "it is multidimensional, composed of both biophysical and social aspects." Further, that actions taken to protect one aspect of wilderness character may diminish another aspect.... For example, the required use of designated campsites to prevent the proliferation of sites and associated impact on soil and vegetation may also diminish the opportunity for unconfined recreation and the sense of freedom from the constraints of society." Wilderness management often requires managers to make tradeoffs between the four dimensions of wilderness character. Landres, et al, provide a framework for wilderness management that is

holistic and balanced, not reductive, absolutist and rigid. They write that, "agency decisions and actions may either support or degrade wilderness character, and the humility, restraint, and respect shown by managers is central to preserving wilderness character." With appropriate guidance from agencies on the use of fixed anchors with humility and restraint, their occasional use would be inconspicuous. Further, the fact that fixed anchors in wilderness must be placed by hand limits their use, as this is a laborious and time consuming process. The occasional use of appropriately camouflaged fixed anchors would have minimal impact on the "undeveloped" dimensions of wilderness character. However, the proposed use of the MRA requires a burdensome, bureaucratic procedure for both wilderness managers and climbers. Its use would erode the ability of a growing number of Americans to experience "unconfined recreation and the sense of freedom from the constraints of society."

The MRA was not written to provide wilderness managers with guidance for making case-by-case decisions on when and where safety equipment for climbers should be used. It is deeply concerning that wilderness managers, who may not have the expertise or guidance to make informed decisions, are tasked with such a serious burden. As the USFS's Minimum Requirement Analysis Guide notes, "Safety is always the primary concern and the need to provide for the safety of all involved in the administrative action will not be compromised regardless of which alternative is selected as the minimum tool." Requiring wilderness managers who are not experts on climbing tactics to make decisions on the use of fixed anchors would compromise climbers' safety.

Further, the application of the MRA to manage fixed anchors is confusing. It is reasonable to wonder, if the use of the MRA as an administrative action to manage fixed anchors were evaluated within the MRA framework it would be rejected on the grounds that it is unsafe. The "USFS's Minimum Requirements Analysis, FAQs and Common Errors," document notes that, "The safety of wilderness visitors and/or workers... is of utmost importance and must be a priority in every action taken. However, most actions involve some measure of risk and should be evaluated in the context of preserving wilderness character." Adventure climbing involves some level of risk that cannot and should not be eliminated. Climbers are warned that climbing is inherently dangerous, and they climb at their own risk. The MRA document mentioned above goes on to say, "most safety issues can be mitigated so that the risk is reduced to an appropriate level. Those alternatives that involve risks for workers or the public that cannot be mitigated should be considered but dismissed." Using the MRA to manage fixed anchors will increase risk to climbers. Again, fixed anchors are an essential tool, even if only used occasionally, for climbers to reduce risk to acceptable levels. Further, there are no alternatives to fixed anchors. In the early 2000s the USFS tasked the Missoula Technology and Development Center (MTDC) with conducting a search of "existing climbing hardware to find a feasible substitute for fixed anchors, or to develop a new piece of equipment that would eliminate the need for fixed anchors." The Center was unable to find a "substitute that could do the job as safely or effectively as fixed anchors." Given that no alternatives to fixed anchors could be found and that safety is of the utmost importance, using the MRA's to manage fixed anchors is confusing, if not contradictory.

The inherent risk associated with adventure rock climbing allows climbers to experience wilderness values, such as the "physical and mental challenges associated with adventure, real consequences for mistakes, and personal growth that result from facing adventure challenges." The purpose of using fixed anchors is not to eliminate risk, but to appropriately manage risk in ways that are consistent with wilderness values. It is noteworthy that none of the iconic, truly adventurous big wall first ascents on El Capitan in Yosemite Valley would have been possible without fixed anchors. It is likely that an unintended consequence of using the MRA for managing fixed anchors would be to concentrate climbers on a relatively small number of crowded and well-trodden, safe classic climbs that do not require fixed anchors. This would greatly reduce the opportunity for climbers to experience solitude and personal growth from adventure and reasonable risk taking.

To repeat, the application of the MRA to managing fixed anchors in wilderness is based on a rigid ideology and absolutist view that the occasional use of fixed anchors erodes wilderness character. We believe this view is incorrect. We urge the USFS and NPS to take a more realistic and pragmatic view, that it is the unguided overuse of fixed anchors that would erode wilderness character. We believe that pragmatic alternatives could be

to develop using the majority recommendations of the USFS's 2003 Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee and NPS's Director's Order 41, 7.2, Climbing in Wilderness. For example, after a year of working on this issue, 20 of the 23 stakeholders on the Advisory Committee reached the following points of agreement to guide the use of fixed anchors in wilderness.

Bolt intensive climbing is incompatible with wilderness.

Level-no-trace or clean-climbing ethics should be integrated into a rule.

After a climbing management plan is in place, a small number of bolts will be allowed to connect terrain.

The guidance provided by DO 41, 7.2 seems to develop, and expand upon these three basic points.

The occasional placement of a fixed anchor for belay, rappel, or protection purposes does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act.

The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation...

"Clean climbing" techniques should be the norm in wilderness.

The use of motorized equipment (e.g. power drills) is prohibited by the Wilderness Act.

Climbers are encouraged to adopt Leave No Trace principles and practices for all climbing activities...

It is surprising that the current alternative proposal ignores the position reached by the overwhelming majority of stakeholders who participated in a collaborative effort. Rather, the proposed alternative seems to side with the two stakeholders who refused to collaborate and compromise to reach consensus on the three points above. The result is an alternative that is ideological, unbalanced, unsafe and confusing. We again urge the USFS and NPS to develop more balanced and safer alternatives by reconsidering and developing these two collaborative efforts.

Thank you for considering our comments.

Respectfully,

Dane Scott

Chair

Western Montana Climbers Coalition

WMTCC Board Members: Katie Willams, Ryan Bressler, Zak Clare-Salzer, Micheal Moore, Damien Powledge, Mackenzie Moore