

Data Submitted (UTC 11): 12/1/2023 7:05:32 PM

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Comments: This action is valid and I welcome it as a 19 year Wilderness professional in the Forest Service, except for this statement, "that a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes, including primitive or unconfined recreation and preservation of wilderness character (proposed FSM 2355.32, para. 1); that existing fixed anchors and fixed equipment in wilderness may be retained pending completion of a Minimum Requirements Analysis, as funding and resources allow, that determines they are the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character (FSM 2355.32, para. 5); and that the issuance and administration of special use permits are encouraged to enhance visitor access to climbing opportunities and visitor education concerning low impact climbing practices (proposed FSM 2355.03, para. 9)." Most of this language is illegal, given the mandates of the 1964 Wilderness Act, and it also contradicts our other policy and Wilderness management direction. There are no situations in which fixed anchors are compatible with the agency responsibility via the 1964 Wilderness Act to preserve Wilderness Character, as climbing is not a necessary activity in Wilderness. Simply put, if climbers want to climb in Wilderness, they can within the bounds of the law, and leaving their gear in the field is against the law, specifically the 1964 Wilderness Act but also other legislation, policy, and direction. It is not the managing agency's responsibility to accommodate any and all types of recreation in Wilderness. Countless legal documents, policies, and regulations are evidence of this truth. The Forest Service sponsored document "Keeping It Wild 2" puts it well on page 85 regarding bridges, "Some wilderness units have justified decisions solely because they support one of the five qualities, in practice trading one quality for another. For example, a bridge may be built to reduce resource damage (such as increased sedimentation from people and horses crossing a stream), resulting in an upward trend in the Natural Quality. However, approving such an action solely on this basis ignores the adverse impacts the bridge will have on the Solitude or Primitive and Unconfined Recreation Quality (because the personal discovery and challenge of crossing the stream is diminished) and on the Undeveloped Quality (because of the presence of an installation). Decisions affecting wilderness character need to preserve wilderness character in its entirety, which means transparently accounting for how a proposed decision affects all five qualities. The qualities used in this monitoring strategy may be useful for organizing and describing potential effects from proposed projects and actions, but these effects would be only one of several factors a decisionmaker considers when determining whether to proceed with a proposed action." The same is true for these climbing anchors, except that the climbing route is not established as is a system trail, is not necessary, and if it were to be part of the administrative unit, would require extensive NEPA analysis, not just an MRA. Even with that analysis, the same conclusion I am giving you is the only legal outcome. Additionally, take a look at most of the Wilderness regulations signed by Forest Supervisors in the country. Most of them prohibit abandoning property in Wilderness. Climbing anchors that are in place now are abandoned property of climbers, Wilderness visitors. Proposed anchors would also violate that standing regulation. If all of that isn't enough, this plan is illegal for exactly what the bridge scenario explains before, that it does not take into account the impact of leaving fixed anchors in the field on all the other aspects of Wilderness Character. This plan runs against preservation of opportunities for solitude, naturalness, untrammeled, and is opposed to the definition of Wilderness areas as places where "the imprint of man's work is substantially unnoticeable". So please, whoever drafted this ill-advised plan, remove the allowance for fixed anchors in Wilderness and stop embarrassing our agency. From partnering with the state to stock non-native fish in Wilderness, to trying to reforest Wilderness areas, to this and more, this agency keeps getting sued for such blatant violations of federal law, and it keeps losing. This is a waste of tax payer time and money, and is a betrayal of the public trust in us as managers.