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Comments: Response to "FSM 2355 Climbing Opportunities #ORMS-3524" and "Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas"

I am an active rock climber & mountaineer-for the past 35+ years, was a member of the Negotiated Rulemaking Advisory Committee-Fixed Anchors in Wilderness at the turn of the century, regularly establish climbing routes in wilderness without fixed anchors, and am a long-standing member and former president of the UIAA (International Climbing and Mountaineering Federation) Safety Commission-the global body governing climbing equipment standards. My objective in providing comment on "Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness Areas" and "FSM 2355 Climbing Opportunities #ORMS-3524" is to promote a balance that includes:

\*maintenance of classic, existing, bolted climbing routes intact (e.g. Eagle Dance in Red Rock Canyon NCA or The East Buttress of Middle Cathedral Rock, Yosemite NP),

\*the maintenance of wilderness,

\*and the use of fixed climbing anchors.

I am providing a single set of commentary that refers generally to both documents with some comments perhaps specific to only one.

I have recently reviewed these documents in preparation for my commentary:

\*DRAFT REFERENCE MANUAL 41: WILDERNESS STEWARDSHIP Evaluation and Authorization Procedures for Fixed Anchors and Fixed Equipment in National Park Service Wilderness

\*Proposed FSM 2355 Climbing Directives-- Forest Service Manual 2300-Recreation, Wilderness, and Related Resource Management, Chapter 2350-Trail, River, and Similar Recreation Opportunities, obtained from <https://usfs-public.app.box.com/s/3q0ctfro41x26x0brajrn0uazt135lux>

\*Proposed FSM 2355 Part 216 Directive Regulatory Certifications-Regulatory Certifications for Proposed Forest Service Manual 2355 - Climbing Opportunities, November 3, 2023, obtained from <https://usfs-public.app.box.com/s/3q0ctfro41x26x0brajrn0uazt135lux>

\*COMPLETE TEXT OF THE WILDERNESS ACT, Public Law 88-577 (16 U.S. C. 1131-1136) 88th Congress, Second Session, September 3, 1964, obtained from <https://parkplanning.nps.gov/showFile.cfm?projectId=29224&MIMEType=application%2Fpdf&filename=WildernessActText%2Epdf&sfid=152506>

\*Director's Order #41: Wilderness Stewardship, obtained from [https://www.nps.gov/subjects/policy/upload/DO\\_41\\_5-13-2013.pdf](https://www.nps.gov/subjects/policy/upload/DO_41_5-13-2013.pdf)

\*NPS Reference Manual #41, Chapter 3, Wilderness Definitions, obtained at [https://www.nps.gov/subjects/wilderness/upload/NPS-W-Defs\\_508.pdf](https://www.nps.gov/subjects/wilderness/upload/NPS-W-Defs_508.pdf)

Comments:

1)I generally agree with draft USFS/NPS documents regarding fixed anchors in wilderness. I fully support federal land managers in their efforts to regulate and manage climbing, fixed anchors, and fixed equipment in wilderness areas. I encourage a balance of the various qualities of wilderness character.

Further, I agree that "Although fixed anchors may be small, there is no 'de minimis' exception to the Wilderness Act's restriction on installations, and the combined impact of many fixed anchors in a single area or rock wall can have a significant effect on wilderness character." Further, the question is not the physical size of the anchor, but instead the size of its effect on the challenge to the climber and the climber's requisite skill and self-reliance (wording from DRAFT REFERENCE MANUAL 41). If fixed anchors had only a small effect on climbers, there would be proportionately small amount of public comment from climbers regarding the regulation of fixed anchors in wilderness. For climbers, "the imprint" of anchors is not "substantially unnoticeable." To misquote John Muir, my comment is: Any fool can place a bolt. Only Uncle Sam has the authority and exigency to regulate fixed

anchors in wilderness.

2)I recommend an update of the NPS definition of "installation" to better reflect the intent of the wilderness act. In NPS Reference Manual #41, Chapter 3, NPS WILDERNESS DEFINITIONS, the text reads: "anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness." I find this definition to be much broader than the meaning of "installation" from the wilderness act, e.g. "without permanent improvements," and I think the current NPS definition would legitimately include things like trash, toilet paper, rock cairns, and a stick sharpened for roasting marshmallows. Though I agree that I don't appreciate finding these things in the wilderness, for me, the part of the "installation" definition that is important from a wilderness climbing perspective is the difficulty with which the item in question can be removed. I can casually kick over cairns; I can pick up toilet paper; but removing a bolt is quite a challenge, especially if I'm trying not to deface the rock.

3)I agree with the DoI/NPS Director's Order #41: "Clean climbing" techniques should be the norm in wilderness. This involves the use of temporary equipment and anchors that can be placed and removed without altering the environment (e.g. slings, cams, nuts, chocks, and stoppers)." This text provides a reasonable distinction between a fixed anchor (installation) and fixed equipment-temporary, can be removed without altering the environment. I recommend that fixed equipment be addressed by regarding it as trash and/or abandoned personal equipment for which regulation already exists (e.g. 36 CFR §261.10e). Thus, many elements in the proposed drafts can be limited to "fixed anchors" rather than "fixed anchors and fixed equipment."

4)Language from "Proposed-FSM-2355-Climbing-Directives-.pdf" could be clearer. Perhaps replace "Allow placement and replacement of fixed anchors only for purposes of belay, rappel, traverse, resource protection, or aiding in ascent and descent" with "Allow placement and replacement of fixed anchors only for purposes of belay, rappel, resource protection, running belay, and/or aiding during traverse, ascent, and/or descent." Here, I have separated the uses and the activities in which use may occur. Perhaps the activity list can be removed without any loss of clarity.

5)In Forest Service Manual 2300, Chapter 2350, 2355.31, I question the word "easier" in the phrase "such as where fixed anchors and fixed equipment are placed or replaced at a location that is otherwise climbable purely to make the climb easier, as opposed to at a location that is not otherwise climbable to enable a climber's ascent and descent of a climbing route." I think that the intent of this passage involves levels of skill, challenge, & self-reliance that go beyond the physical difficulty of the climb and that this enlarged scope deserves attention here. This wording from "DRAFT REFERENCE MANUAL 41: WILDERNESS STEWARDSHIP ..." supports a broader interpretation of "easy": "builds self-reliance, presents challenge, and requires skill." Perhaps the wording along the lines of: "...purely to make the climb physically easier and/or less challenging, and/or to reduce the requisite skill and/or self-reliance."

6)If there are going to be bolts, they should be reliable. In regulation and guidance on its interpretation, I encourage land managers to consider the UIAA Safety Commission mantra that "equipment that is properly used, inspected, and maintained should not fail." In my opinion, there is not much sense incorrectly installing bolts. This raises two issues that are not well addressed in the proposed drafts. First, the integrity of a bolt anchor depends much on integrity of the bolt hole (citation example: Influence of construction conditions on strength of post installed bonded anchors, <https://doi.org/10.1016/j.conbuildmat.2017.12.144>). Thus, there MIGHT be good reasons to permit wilderness power drilling to promote reliable anchors. I see such use of power drills as being akin to the use of helicopters to remove human waste from wilderness campsites. Second, I encourage the use in wilderness of fixed anchors that adhere to the UIAA corrosion resistance classes of general corrosion resistance or high stress corrosion and general corrosion resistance ([https://www.theuiaa.org/documents/safety-standards/123\\_UIAA\\_RockAnchorsV4\\_2020.pdf](https://www.theuiaa.org/documents/safety-standards/123_UIAA_RockAnchorsV4_2020.pdf)). Appropriate corrosion resistance can dramatically increase the working lifetime of an anchor and thus time between anchor replacement. For the time being, a make and model of a UIAA corrosion resistant bolt that can easily be replaced without power tools may not exist, so this corrosion recommendation may be hard to effect.

7)If land managers are looking for guidance regarding grandfathering of bolted climbs in wilderness or the appropriate number of fixed anchors on a proposed new climb, I recommend the date of the start of the Negotiated Rulemaking Advisory Committee; Fixed Anchors in Wilderness deliberations (June 2000) as baseline for grandfathering. Further, the final, unratified draft could be a starting point for defining de minimis. The draft is

not consensus, but it might be as close to consensus as is possible. And the date is long enough ago that "grandfathering" might apply. The NRC deliberations were well publicized. Since this time, the climbing community has surely recognized that bolts installed in wilderness areas might well be on the chopping block.

8)The argument that bolts should be permitted for "safety" is specious for a number of related reasons. Climbing inherently implies risk; wilderness too is not safe, as per clear wording in Proposed FSM 2355 Climbing Directives: 10, which notes that the Forest Service's national quality standards, including inspection and hazard mitigation, do not apply to climbing opportunities (FSH 2309.13, ch. 50). Further, risk homeostasis is a thing; installation of bolts only attracts climbers with a different, yet still insufficient experience base and will not necessarily insure "safety." Yes, this is elitist, in the sense that the wilderness presents a challenge and requires self-reliance and skill beyond what is expected outside the wilderness boundary. Instead of "safety," I propose that the salient metric be the ability for climbers to manage their risk. I recommend changing the wording in many instances from "safety" to "risk management" to make clear the risk element inherent in wilderness climbing and the need for additional attention to risk management required in wilderness areas.