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Comments re:

Please accept the following comments. These comments are in response to the November 2023 USDA Forest Service proposal specific to Forest Service Manual (FSM), Section 2355 - Climbing Opportunities establishing code, caption, and direction for climbing opportunities on National Forest System lands. Thank you for the opportunity to comment.

Regulation of rock climbing on public land is sorely needed in the interest of resource protection and avoidance of use conflict.

As stated, "The proposed directive would provide guidance on climbing opportunities inside and outside wilderness on NFS lands and would provide for climbing opportunities that serve visitor needs; meet land management and recreation policy objectives; emphasize the natural setting of NFS lands; align with natural and cultural resource protection and the Agency's responsibility to Indian Tribes; and are consistent with applicable law, directives, and the applicable land management plan."

I would say that climbing opportunities do not serve climber "needs", but simply serve their desires, which can grow without bounds and do not require serving at the expense of public resources or values. It is the actual needs of wildlife, like mountain goats, bats, cliff dwelling raptors and the like, as well as Wilderness values that should be preferentially served.

I worked as a rock climbing guide in Wilderness for ~10 years, guiding hundreds of people, and never needed to leave fixed protection. Fixed protection, although sometimes convenient, is not necessary for the safety of climbers. Discretion and judgement of the climber is what provides safety and should be taken along on any climbing adventure. If a climber finds a route is not climbable without unauthorized bolts, they can back off and go for a climb that is. There is no need to make everything climbable for every level of skill. Much of the creativity and adventure of climbing is taken away by routes marked by fixed installations.

The need, actual and urgent, for climbing management on the Bitterroot National Forest was starkly realized in 2014 when a small group of climbers took it upon themselves, without consulting the BNF, to construct an outdoor sport climbing gym with over 500 bolts on about 60 closely spaced routes in a Recommended Wilderness Area. The fact that they did not realize it was in a RWA clearly demonstrates the need for a FS review and permitting process for the installation of bolts to analyze and avoid such preventable impacts.

I was involved from the beginning with a collaborative effort to develop a Climbing Management Plan on the Bitterroot National Forest in early 2020, triggered by the above-mentioned behavior by climbers. After over 2 years, many, sometimes contentious, meetings and much time and energy the BNF stalled the CMP project to wait for this national proposed Directive, which is fatally flawed due to overtly accommodating Access Fund wishes while failing to consult with Wilderness Watch and conservation interests. Now this proposed Directive will also prove to be a sink hole of time and effort, not to mention taxpayer expenses. It will need to be fundamentally revised due to catering to special recreational interests and commercialization, while losing sight of the greater public good.

One thing that has become quite apparent is that there is a wide range of attitudes within the climbing community. Some climbers aspire to be strictly ethical; some don't, and act with unbridled entitlement and disregard for public resources and other forest users. "Sport climbers", in particular, tend to take a "social" indoor climbing gym culture out into the public forest with no understanding, or even thought, about the forest or other forest users, let alone wilderness values. Nearly all climbers are not fans of regulation (who is?) but careless climbers and the explosion of climber numbers have made regulation necessary.

The proposed Directive states, "...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)..."

I cannot imagine a scenario whereby fixed climbing anchors are necessary for the administration for Wilderness Act purposes. On the face of it, use of a fixed anchor is the antithesis of "unconfined". A climbing anchor's very purpose is to restrain, ie to trammel. Wilderness is meant to be free of trammeling. The placement and replacement of fixed anchor installations violates preservation of wilderness character and so should be prohibited in Wilderness, Wilderness Study Areas and Recommended Wilderness Areas, which all require maintenance of wilderness characteristics.

For implementation purposes, the policy "...a Forest Supervisor may authorize the placement or replacement of fixed anchors and fixed equipment in wilderness based on a case-specific determination" will require an accurate baseline of existing bolted routes as well as individual bolts on bolted routes. That inventory along with an immediate moratorium on further bolting should begin as soon as possible to preclude a land rush of staking new claims by bolting new routes. That horse may be out of the barn now with the release of the proposed Directive. The barn door needs to be closed immediately with a bolting moratorium like the one the BNF has in place. There will be plenty of climbs available while waiting for CMPs.

NPS Branch of Solicitor's Office OGC Superstitions 1990 opinion: "Many climbers do not follow preexisting routes and, of those that do, frequently they do not feel compelled to use the previously installed bolts. Thus, an argument that rock bolting is authorized under the Act because it minimizes resource damage is unpersuasive as a matter of fact as well as law." This situation argues for the need to locate each individual bolt in a baseline inventory.

The damage caused by climbing, especially when "special use permits are encouraged to enhance visitor access to climbing opportunities" (proposed Directive) in Wilderness will not be confined to the climb itself. Access trails and camping spots, especially at nearby mountain lakes, will proliferate and degrade with increased use. Displacement and loss of security habitat will increase in these places of last refuge for many species of wildlife. The proposal to "enhance visitor access to climbing opportunities" itself seems to guarantee degradation of wilderness characteristics by reducing isolation and opportunities for solitude.

Sport climbing areas, with their density of bolts and routes, create intensive impacts and contribute to "social gravity" whereby a "see and be seen" allure can exponentially increase user numbers and resulting environmental damage and use conflict. The seemingly inevitable social media posts by selfie stars supports this phenomenon of explosive increase in use. Sport climbing is a special case and, if permitted on National Forests, should be located next to roads, in rock quarries or on already severely degraded land, definitely not W, WSAs or RWAs. The Directive should specifically address construction of sport climbing gym areas on National Forests. The proposed CFR seems to inherently preclude permitting sport climbing due to level of impacts: "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). Sport climbing areas are very high impact, essentially displacing nearly all other human uses along with whatever wildlife might inhabit the area.

The proposed Guidance should recognize fixed anchor climbing routes are vertical trails subject to regulations governing trails.

Cultural sites, including sacred sites not necessarily containing artifacts, should be protected by the authorization process.

Use of power drills should be prohibited in Wilderness, WSAs and RWAs.

At this point in the process an immediate moratorium on new bolt installations is sorely needed. It would be irresponsible to do otherwise, knowing that unregulated resource damage and use conflicts will be triggered by the action of presenting the draft Directive to the public. An image of the gunshot start to the Oklahoma land rush comes to mind.