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Title: Board Member

Comments: On behalf of the Eagle Summit Wilderness Alliance (ESWA) and its 300+ dues paying members, I am writing regarding the proposed new Section 2355 to Forest Service Manual (the "Draft Directives"), particularly as they relate to bolting in wilderness areas. ESWA is a Colorado non-profit that works to protect, preserve, and maintain the four congressionally designated Wilderness Areas in Eagle and Summit Counties, Colorado. In 2023, ESWA's members contributed over 7000 hours of volunteer time in coordination with our local Ranger Districts in furtherance of this mission.

The 1964 Wilderness Act expressly prohibits the placement of "installations" in Wilderness Areas. NPS Reference Manual 41, Section 3.1, correctly defines "installations" as "anything made by humans that is not intended for human occupation or is left behind when the installer leaves the wilderness." Bolts drilled into wilderness rock faces, cemented in place, and left for future use by others clearly fall within this definition. The Draft Directives correctly confirm that bolts are "installations" generally prohibited by the 1964 Wilderness Act.

Some bolts were placed in a small number of Wilderness Areas prior to their designation as official Wilderness Areas, and other after such designation without agency permission. The Draft Directives allow these to continue to be used pending adoption of a climbing management plan by the relevant park or forest service managers. The climbing management plan would be developed in a public process that analyzes, based on local conditions and circumstances, whether bolts are appropriate, including the history of their use in the area, the impacts on other wilderness Qualities, and the availability of less impactful alternatives. The Draft Directives recognize that bolting should be allowed only if and when it has an overall positive effect on the Qualities of wilderness character.

As stated in the NPS Director's Order 41 ?7 (2013) "fixed anchors or fixed equipment should be rare in wilderness" and "the establishment of bolt-intensive climbs is considered incompatible with wilderness preservation and management."

The Wilderness Act was a historic (and rare) moment when Americans imposed restraints upon themselves and recognized the intrinsic value of wilderness. Ever since 1964, special interest groups have tried to chip away at the constraints on human activity imposed by the Wilderness Act. Mountain bikers want an exemption for bikes; hunters want an exemption for wheeled game carts; photographers want an exemption for drones; race organizers want exemptions for commercial events; motorboat users want access to pristine lakes; and on and on. Despite these pressures, it is the legal and moral obligation of the USFS and NPS to follow the clear proscriptions in the 1964 Wilderness Act and preserve the natural values of congressionally designated Wilderness Areas despite pressures from special interest groups.

Less than 3% of the Lower 48 States is protected as congressionally designated Wilderness. If some rock walls in a Wilderness Area cannot currently be safely climbed without drilling bolts, they should be left as an inspiration and challenge to future generations. It is inconsistent with letter and spirit of the Wilderness Act to mar them to satisfy human desires. Bolting is not a "primitive" form of climbing. Only primitive types of recreation are allowed under the Wilderness Act.

Accordingly, ESWA's preference is to not allow any bolting in Wilderness Areas except as needed for emergency rescues. ESWA agrees with and hereby adopts the reasoning and arguments on this issue submitted by Wilderness Watch, and by Rocky Smith, both on behalf of numerous other organizations.

Very few Wilderness Areas had a history and culture of bolting prior to their inclusion in the National Wilderness

Preservation System. The Draft Directives provide that local land managers can allow use of a limited number of bolts after a public Minimum Requirements Analysis is done in connection with the preparation of climbing management plans and under a carefully crafted permit system. If such bolting is to be allowed under the Draft Directives, ESWA concurs with the proposed language changes suggested by Anne Dal Vera in her comments submitted on January 21, 2023. Her proposed changes are pasted below for your convenience.

Michael Browning,
Board Member and
on behalf of the Eagle Summit
Wilderness Alliance

ANNE DAL VERA COMMENTS ON USFS DIRECTIVE:

My overall comment is that fixed anchors are an installation and are prohibited in wilderness by section 4C of the Wilderness Act. Therefore, they should only be permitted in emergencies, for the safety of rescuers or when a route that is climbed with removable protection cannot be escaped without a fixed anchor.

I also submit my comments about the substance of the amendment:

There are several aspects of the directive that I support, including:

1. The inclusion of the phrase "As funding and resources allow" in discussing the process of inventory and developing climbing management plans in units of the National Forest System.
 2. The emphasis on education and promotion of Leave No Trace principles and resource protection throughout the document.
 3. 2355.21 Climbing Management Plan
 12. "Restrict or prohibit the placement or replacement of fixed anchors and fixed equipment in wilderness unless specifically authorized based on a case-specific determination that they are the minimum necessary for administration of the area for Wilderness Act purposes."
- This statement is clear that the purpose is to administer the area as Wilderness, not to allow members or groups of the public to place or replace fixed anchors.

4.2355.3 - Climbing Management

- a.4. Conduct law enforcement patrols at climbing opportunities as necessary to protect visitors and NFS resources.

Improvements I would like to see: (additions are in red letters)

1. Definitions of several terms would be better placed earlier in the document so that the public has an understanding of the scope of the document. At the least, perhaps in section 2355 - Climbing Opportunities could be the definition of climbing that appears in Section 2355.05. This would be helpful because the FS directive encompasses all forms of climbing, whereas the NPS directive focuses solely on fixed anchors in Wilderness.

2.2355.03 Policy

13. Promote stewardship opportunities and collaboration between the Forest Service and climbing organizations. What exactly does this mean? It may put the Forest Service legally liable for actions approved to expand or enhance a form of recreation that is not permitted by the Wilderness Act. If this is retained, Add wilderness stewardship and advocacy organizations to this statement to provide balance to the collaboration.

The first section of the Directive should be improved by including policy statements regarding fixed anchors in

Wilderness, specifically the following:

- 1.Fixed anchors are a type of installation and therefore are a prohibited use pursuant to Section 4C of the Wilderness Act and may only be authorized if they are determined to be "necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness Act through a minimum requirements analysis (MRA).
- 2.it is important to recognize and consider the cumulative effect of the impacts to Wilderness Character. And that all the qualities of Wilderness Character are separately important to preserve. No one quality should be sacrificed for another.
- 3.Fixed anchors or fixed equipment should be rare and clean climbing should be the norm in wilderness.
- 4.The establishment of bolt-intensive face climbs is considered incompatible with wilderness preservation and management.
- 5.Forests must consider all climbing opportunities that exist outside of wilderness in their evaluation of the necessity to use fixed anchors in wilderness.
- 6.The use of motorized equipment to install bolts is also a prohibited use pursuant to Section 4C of the Wilderness Act.

3.2355.04a - Washington Office, Director of Recreation, Heritage, and Volunteer Resources

Working with local and national climbing organizations and manufacturers of recreational equipment and wilderness stewardship and advocacy organizations to achieve climbing program objectives. See also:

a.2355.04c Regional Foresters

3 Developing and maintaining effective working relationships with climbing organizations, wilderness stewardship and advocacy organizations and Tribal governments.

4.2355.21 Climbing Management Plan

"Climbing management plans must be prepared in accordance with applicable law and directives and the applicable land management plan and with public input, including from user groups such as local climbing organizations." Add "and wilderness stewardship and advocacy organizations as well as Tribal Governments"

5.2355.04b - Washington Office - Director of Wilderness and Wild and Scenic Rivers

2. Preserving wilderness character and wild and scenic river values is essential as our population continues to grow and the demand for outdoor recreation increases. Although monitoring of the impacts on wilderness character and wild and scenic river values is important, it is more important to prevent impacts to these treasured places. Forest Service staff who are responsible for upholding the standards on the ground should be held accountable for preventing impacts to wilderness character and wild and scenic river values.

6.2355.21 - Climbing Management Plan

10 - strategy for managing human waste, trash and graffiti. Please make it clear that climbers are responsible for the maintenance of any facilities that support climbing at the area. See also:

2355. 35 - Sanitation

The climbing management plan should make clear that climbers are responsible for the installation and maintenance of appropriate sanitation facilities. If free bags are required, the climbers are responsible for the removal and disposal of the used bags.

7.2355.33 - Minimizing Impacts from Climbing Activities

2. Merely "Taking into consideration" the input on management of climbing opportunities received during Tribal consultation is not enough. This section should be stronger, and in the following ways:

a.Include in 2355.05 Policy 3 - Executive Order 13007, Indian Sacred Sites

b.Change the wording of Section 2355.33 - Minimizing Impacts from Climbing Activities - 2 to read "Include the input on management of climbing opportunities received during Tribal consultation. Avoid adverse affects on the physical integrity of Indian Sacred Sites and the access to those sites for ceremonial uses."

I do not support the following statements in the directive:

2355.3 Policy

6. b. should be a stronger statement. The statement would be improved in this way: The placement of fixed anchors does impair the future enjoyment of wilderness and more importantly, it does violate the Wilderness Act. Also, the establishment of bolt-intensive climbing opportunities is incompatible with the preservation of wilderness character. Climbing with permanent installations is not a primitive form of recreation. It is a development, which is destructive to wilderness character. And bolt-intensive climbing opportunities are available outside of wilderness. They should not be allowed in wilderness.

2355.03 Policy

9. It should not be policy to "increase visitor climbing opportunities" in wilderness that would increase the development of bolted ascents of rock. This is incompatible with wilderness character because it increases development in a wilderness area. WILDERNESS CHARACTER INCLUDES UNDEVELOPED CHARACTER. It is against the Wilderness Act for the Forest Service to enhance or expand opportunities for recreation over the protection of Wilderness Character. The Wilderness, solely by its existence, inherently provides opportunities for solitude or a primitive recreation.

See also:

2355.04d Forest Supervisors

10 ... administer recreation special use permits to increase visitor climbing opportunities add "outside wilderness" to the sentence.

2355.04e - District Rangers

3". . . . issuing and administering recreation special use permits to increase visitor climbing opportunities..." add "outside of wilderness" to the sentence.

2355.38 - Recreation Special Uses

If it is important to "increase visitor climbing opportunities", add "outside of wilderness" to the sentence. Do not increase visitor climbing opportunities by allowing the placement of fixed anchors to new areas inside wilderness.

I also do not support the section of 2355.21 - Climbing Management Plan that allows managers to "evaluate the use of Forest Service resources versus leveraging funding or other forms of assistance through cooperative agreements with climbing organizations." While climbing organizations would have both an abundance of knowledge about potential areas for development of climbing opportunities, their understanding of the Wilderness Act and other relevant laws could lead to unrealistic expectations and increased development inside wilderness in the climbing management plan. Minimum Requirement Analyses for climbing with fixed anchors in wilderness must be completed by trained Forest Service staff, not by climbing organizations. And it is important to require in the Directive compliance with NEPA for climbing management plans, without the use of Categorical Exclusions.