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Organization:

Title:

Comments: Dear USFS,

I oppose the new directive under (2355 - Climbing Opportunities) regarding the increased regulation of the placement or refurbishment of fixed anchors.

I'll begin by acknowledging that the USFS manages vast swaths of land, across many types of environs, while managing many types of recreation, all the while balancing the needs of numerous groups of stakeholders. It's a huge job, on a relatively small budget and I appreciate it greatly.

I got first tastes of rock climbing in the 90's in The Sierra Nevada through and Outward Bound course. I was fully bit by the bug in the early 2000's and have been climbing regularly ever since. I've utilized fixed anchors around the Sierra Nevada within wilderness boundaries.

With that huge job comes the impossible task of understanding in detail how a proposed regulation could effect wilderness use on a day-to-day basis. I'd like to share my perspective on the proposed guidelines.

Here's the key idea:

Fixed anchors are an essential piece of climbers' safety system and are not prohibited "installations" under the Wilderness Act - they are "substantially unnoticeable" to use the terminology of the Wilderness Act. Following existing, long-standing climbing policies that allow judicious use of fixed anchors for more than a half-century will do more to protect Wilderness character while providing for primitive and unconfined Wilderness climbing.

To expand on the "substantially unnoticeable" part, even as a climber, with a trained eye and infographics/photos as an aid, I regularly struggle to pick out fixed anchors when viewing a climbing route from the base and attempting to plan my ascent. Even when on the rock, it's easy to amble right passed these fixed anchors while actively looking for them.

I compare that to the backcountry ranger cabins, footbridges, retaining walls, trail signs, summit shelters(like on Mount Whitney) and other permanent installations that are regular sights while hiking in the wilderness. Just like those features are minimally introduced to increase safety and accessibility, so too are fixed climbing anchors. If you were to removed those man-made hiking features, problems would follow. Below are a list of unintended consequences of this fixed anchor regulation:

-Bolts and fixed rappel stations prevent resource degradation in delicate alpine environments. These types of planned descent routes not only avoid vegetation damage (rappelling from trees, scrambling through fragile sections of alpine plants, etc.) but also create descent options that reduce rockfall hazards, minimize chances of climbers getting ropes stuck on descents, and avoid dangerous situations and costly rescue operations. Bolted anchors tend to reduce trampling and social trail creation in delicate alpine environments by directing all climbers to a single location on durable rock surfaces instead of wandering around to assess descent options.

-Aging hardware makes climbing routes and descents less safe, which causes more accidents. Maintenance of existing anchors is very important to the safety of climbers and is labor intensive to perform. The proposed directives will make existing routes more hazardous by restricting maintenance of bolts and anchors.

-On wilderness routes, bolts are already placed sparingly. In situations where no removable gear can be placed, bolts are placed to prevent catastrophic falls. Rappelling from some type of fixed anchors is often the only option

for climbers to safely retreat from routes without SAR rescue, for example during inclement weather. Prohibiting these placements will lead to potential for more catastrophic falls in the wilderness and more SAR calls. Furthermore, SAR teams rely on fixed anchors to perform rescue operations. Not permitting fixed anchors will jeopardize SAR rescue operations and unnecessarily endanger the lives of rescuers.

-Rappelling is frequently the primary cause of death in climbing accidents. When climbers rappel, they rely completely on an anchor, and anchor failure during rappelling often results in death. Prohibiting the maintenance of anchors or any placement of bolted anchors increases use of unreliable natural features that greatly increase the risk of anchor failure and impacts on vegetation.

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In summary, placing undue and unreasonable restrictions on climbing will not protect wilderness areas but will severely strain a largely beneficial and cooperative relationship between the climbing community and land management agencies. This will benefit neither climbers nor the USFS and NPS.

Thank you for your considering my thoughts on this topic and for your continued service to our National Forests.

Kind regards,

Tom Forquer