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Comments: Comments on USFS (draft) Chapter 2355 - Climbing Opportunities

Fixed Anchors & Fixed Equipment in USFS Wilderness and non-Wilderness Areas

1. In crafting the Wilderness Act of 1964, Congress intended that the Act should protect and enable management of places on our national lands that have exceptional qualities of 'Wilderness character' - "untrammelled, undeveloped, natural, having outstanding opportunities for solitude or primitive and unconfined recreation, and other features of scientific, educational, scenic, or historical value". Aims of the Act, among others, are to provide experiences that challenge users of America's wild lands and to promote values of perseverance and self-reliance. Unquestionably, climbing in Wilderness areas is challenging, furthers these values and helps define the Wilderness experience.

2. Existing Forest Service policy has allowed the limited use of fixed anchors for ascent and descent in USFS Wilderness. This policy has successfully supported exploratory climbing as well as repeats of established routes, and many climbers' experiences in Wilderness have been assisted and enhanced by existing fixed anchors. Cases in point are routes in Maroon Bells-Snowmass, Lizard Head-Uncompahgre, Bridger-Wind River and Linville Gorge Wilderness areas. In these areas, and in many others, climbing pre-dates their designation as Wilderness.

3. Now, an issue has arisen concerning existing fixed anchors in Wilderness, and that is whether they are considered 'installations' under the Wilderness Act. Considering them as such would unleash the MRA process, and a 'negative finding' of MRA could threaten the continuation of climbing on routes where fixed anchors are required for descent; i.e., where there is no other way to exit the climb except to rappel. Further, fixed anchors are resource protection tools since rappels tend to minimize or reduce human impacts such as the creation or enlargement of exit trails from summits which experience shows cause erosion, degrade vegetation and detract from the Wilderness experience.

4. In my view, there is no need to enter this MRA arena since (draft) Chapter 2355.03.6b properly shapes a policy for fixed anchors in Wilderness. It states, "the placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act. Most, if not all, climbers in Wilderness would heartily agree with that proposal and would support the policy's second component; that "the establishment of bolt-intensive climbing opportunities may be incompatible with the preservation of wilderness character." Finally, adoption of such a policy would reduce administrative burden (no need for MRAs), and would allow the climbing community itself to use, maintain, and replace fixed anchors for safety's sake and for continued enjoyment of the Wilderness experience.

5. Instead of subjecting existing fixed anchors to MRA, USFS should, when practicable, evaluate routes with existing fixed anchors through an area or crag-focused climbing management plan (CMP). These evaluations should focus on climbing opportunities in Wilderness and non-Wilderness. The resultant CMPs should address the question of fixed anchor authorizations and mitigate other impacts of concentrated human activity associated with climbing, e.g., erosion and compaction of surfaces; potential impacts on cultural resources, wildlife, plants and water resources; signage; human waste management, etc. On routes that have not yet been evaluated through the CMP process, USFS should allow the use of existing fixed anchors.

6. Developing and implementing a CMP requires funding, resources, and expertise. It is a complex and specialized undertaking as it considers whether rock faces are climbable with or without fixed anchors, the integrity and safety of existing fixed anchors, whether existing fixed anchors should be replaced, the stability of

access trails, and other issues associated with the popularity of climbing and the burgeoning human use related to it. USFS might be challenged to obtain and supply the expertise and resources for such evaluations and undertakings. Local climbing organizations have this expertise and resources in some measure and are appropriate bodies with whom USFS should partner in managing climbing in Wilderness and non-Wilderness areas. USFS is commended for recognizing the value of partnerships with public and private climbing organizations as noted in (draft) Chapter 2355.03.13, 2355.21, 2355.3.2 and 2355.4.

In closing, I ask that USFS do the following under (draft) Chapter 2355:

1. Add a definition for 'Climbing Management Plan (CMP)' under 2355.05. This definition could include language such as, "A plan, consistent with applicable law and any applicable land management plan, that governs the use of climbing opportunities in a fashion that protects resource values, mitigates adverse resource impacts and/or conflicts, and promotes outdoor ethics principles".

2. Remove all designations of fixed anchors as 'installations.' If that were done, then there would be no need for Minimum Requirements Analyses (MRAs) for authorizing the use and replacement of existing fixed anchors in Wilderness.

3. In section 2355.32.1, delete the current proposed second and third sentences, and replace them with the following language as a second sentence: "The placement of a fixed anchor or fixed equipment does not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act". Such replacement simply reinforces language the USFS already proposes in 2355.03.6b; there is nothing new here.

4. Please identify liaison officers with whom local climbing organizations can communicate and plan the implementation of on-going and future efforts to manage the development and implementation of CMPs through relevant agreements.

Thank you,
Robert F Buzzard, Jr.