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First name: Michele

Last name: Dieterich

Organization:

Title:

Comments: Thank you for taking on the regulation of rock climbing on public land. It is long overdue and very necessary to protect our natural resources like raptors and mountain goats. Regulation will also prevent use conflict. Regulating bolting on public lands is in the public's best interest.

This Proposed Directive (Directive) is important to me because I have experienced what can happen when bolting goes unregulated on the forest. I live on the edge of the Bitterroot National Forest (BNF). In 2014, a few climbers created a climbing area with over 500 bolts on about 60 closely spaced routes in Recommended Wilderness. The climbers had no idea they were bolting in Recommended Wilderness. They had not taken the time to check. They also did not know they were bolting routes in known mountain goat habitat and known golden eagle and peregrine nesting areas. They did not know these things because there was not authorization process in place for bolting.

The climbers did not take the time to consider the impacts of a dense array of climbs on the wildlife and the Wilderness quality of the area, because they did not have to. They then advertised this area as a beginner area and the next step up from a climbing gym. It has become quite popular since. Large groups have asked the BNF if they can come and climb, I have picked up trash from the area, and the steep user created trail causes erosion on the steep hillside above a popular hiking trail.

This is a sad story. The saddest part is that the climbers who developed the route did not even know they were bolting routes in Recommended Wilderness. This example is why regulation of bolts on public lands must be addressed and quickly. Even the Forest Service must go through the proper channels to create trails. Climbers not only create new trails to reach new climbs, they are also creating vertical trails and installing permanent hardware on public lands without oversight.

First, a moratorium on placing bolts on public lands must be put into place until adequate mechanisms are put in place to protect wildlife, Wilderness quality, and other users. This should be in place until forests complete Climbing Management Plans (CMP) and Minimum Requirements Analysis.

A complete moratorium is the only way to get climbers to the table. The BNF had to finally put a moratorium on bolting to get the attention of climbers and get them to the table to create a climbing management plan for the BNF. A moratorium will also prevent climbers from staking claims on every possible rock before plans are put in place. That Forests will not create climbing management plans until funds are available is yet another reason to have a moratorium on bolting. It could be years until funding is available and the knowledge that closures are imminent will spur climbers to bolt new routes before climbing management planning even begins.

A moratorium requires no funding and will prevent further impacts until CMP's are in place.

I fully agree with an inventory. It is the best way to regulate what is to come and to assess impacts. The inventory should include both routes and the number of bolts in each route.

I worked as a climbing guide on public lands including Wilderness. I guided people of all ages and experience with removable gear. I never felt the need to use a bolt or leave any equipment upon leaving a climbing area. Traditional climbing does not require bolts. If a climber cannot climb it using removable gear, it was not climbed. Such is the limitation on climbing that leaves no trace.

No bolts should be allowed in Wilderness or any areas managed to preserve Wilderness qualities. Bolts are permanent installations that are not permitted by the Wilderness Act of 1964. Yes, I agree that climbing is appropriate for Wilderness, but not climbing that requires permanent installations. As said before I and many before me have climbed in Wilderness with removable gear.

All cultural sites should be protected and climbing should not be allowed if it disrupts a cultural area or its use.

Power drills should not be banned in Wilderness and areas managed for Wilderness characteristics.

Sport climbing is separate type of climbing using permanent bolts. It is much easier and less risky than traditional climbing. Because it is less risky and does not require the skill of placing removable protection, sport climbing is popular and attracts many more people to the sport. Sport climbing areas tend towards a high density of routes which creates higher use and greater impacts. Sport climbing is different from traditional climbing and should be considered separately because it promotes more intensive use and impact. If sport climbing areas are permitted, they should be located near roads, in rock quarries, or in already degraded areas. It should not be allowed in Wilderness, Recommended Wilderness (RW), and Wilderness Study Areas (WSA).

The 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..." As I have stated before, permanent bolting is not necessary to climb in Wilderness, so no bolts are necessary. It is not up to the forest to make climbing safe and if it proposes to by determining bolts "necessary," it will open itself up to litigation. Please list the reasons why a bolt might be considered "necessary" in Wilderness. I cannot think of any. There is inherent risk in climbing and climbers have been assessing and living with that risk for quite some time.

I am also unsure as to the language, "... 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..." What administrative purposes might make bolted climbs necessary for administration of the area for Wilderness Act purposes. Bolted climbs will bring more climbers into the Wilderness, destroying opportunities for solitude for both climbers and other users. The installation of fixed anchors on our public lands must require an authorization permit. This will protect areas and would have prevented a huge climbing area in RW as we have on the BNF. An authorization process will allow the forest to assess the area and protect cultural sites, raptor nesting areas, and wildlife habitat before bolting happens. It also allows for discussion and education to climbers who wish to create routes on the forest.

Thank you for declaring bolts as permanent installations. Bolts permanently change the rock and also makes the climb attractive to more climbers generating more use and impact. Permanent installations should not be permitted in Wilderness, RW, and WSAs. Nor should power drills. There are so many climbing opportunities outside these areas. If climbers wish to climb in Wilderness, they should train to climb traditionally without mechanization and motorized assistance. That would be a true Wilderness experience. Bolted climbs are not a Wilderness experience. Wilderness should continue to be a challenge as so many have enjoyed for so many years.

A full 800 meter or half mile seasonal closure around raptor nests must be included in this directive. This protects peregrine falcons and golden eagles allowing them to nest successfully. Raptors often only have one chance at reproducing each year, and many are sensitive to human presence. The Access Fund has produced their own research to show that if the climb cannot be seen from the nest, it will not affect the birds. The study does not consider that the raptors leave the nest to acquire food to feed their young. They can also hear humans nearby as climbers must yell "On belay" and other vocal communications the distance of a rope length. The study does not analyze the stress on raptors caused by hearing humans and not seeing them. Nor does it analyze the affect of leaving the nest to find food and seeing a human within arms reach of their young. Did they consider whether the raptors refrained from leaving the nest and feeding their fledges when they could hear humans? I suspect they did not. The weight of available science clearly shows that a buffer of ½ mile is necessary to ensure successful nesting of cliff dwelling raptors.

Mountain goats and bats are in decline. One study showed that mountain goats have declined by 70% over the

last 20 years. And bats are slowly being listed as endangered. These animals need cliff areas to survive. All areas proposed for climbing routes and existing routes should be analyzed for effects to mountain goats, bats, raptors, and other species that depend on the rock cliffs coveted by climbers.

No further outfitter use permits should be issued until a thorough analysis of existing inventoried climbing use, a thorough carrying capacity analysis, and an effects analysis are completed for each forest. This should include cumulative effects of other special use permits in areas with climbing routes. Outfitters often congregate in the most favored places and set up camp for the season. How will this effect individual climbers and their experience, especially in areas with beginning and intermediate climbs? Are other outfitter base camps located in climbing areas during climbing season? Where are the overlaps and how will they affect the public's access to the area? These things should be considered, disclosed, and fully analyzed before allowing any more outfitter permits in the area.

Thanks for your time and consideration.