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Comments:

Re: FSM 2355 Climbing Opportunities #ORMS-3424

Climbing has been an integral part of USFS lands since prior to the creation of the USFS in 1905, and is a long standing American tradition. The activity of climbing has certainly grown in popularity over the years, and "fixed" anchors such as bolts have become an integral part of the activity. Used in both ascending and descending climbing routes, the standards for bolts have also been raised by the climbing community - both in the composition and usage. No longer is it acceptable to use cheap hardware store bolts of unknown quality, recognizing the safety impact to the climbers who use them. The impact to those other land users who do not climb is also taken into consideration, and bolts are now camouflaged to keep them hidden from the untrained eye. Additionally, outside of sport climbing areas, it is widely accepted that bolts should only be placed where removable protection, such as camming devices and wired stoppers, cannot be used - generally dictated by the geology of the area and difficulty of the route.

The Minimum Required Analysis was not designed to manage the use of bolts, which are both historic and an essential piece of safety equipment. Many problems will arise if the MRA is used to manage fixed anchors.

The use of MRA to manage fixed anchors is unbalanced and restrictive. It erodes wilderness character by unnecessarily restricting opportunities for a growing number of Americans seeking authentic wilderness experiences through adventure climbing.

The use of MRA raises serious safety concerns for climbers by requiring wilderness managers to make critical safety decisions without the necessary guidance, expertise and information to make such decisions.

Wilderness character is a multidimensional concept, and wilderness management requires a diverse approach involving and balancing trade offs. The USFS and NPS also place a high priority on the safety of users, and there have been several examples over the years where accidents, some fatal, have occurred where bolts removed from well known routes due to restrictive and misguided practices.

I urge the USFS to reconsider its proposed measures surrounding bolting, specifically the MRA. Many climbing organizations, such as the American Safe Climbing Association and Access Fund, are in support of a more diverse and practice based approach to climbing management, and I request that the USFS look to these experienced organizations for additional guidance. Just as we look to wildlife biologists, geologists, hydrologists, and foresters for expertise in their respective areas for guidance, this case should be no different. Thank you for your time and consideration.