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Comments: I would like to make comment upon FSM 2355 Climbing Opportunities #ORMS-3524

I am a long-time resident of the Eastern Sierra and living here have the Inyo National Forest minutes away, my house as an inholding in the Toiyabe National Forest and multiple USFS administered wilderness areas visible from my windows. These are all within a few hours or less drive from my front door and I visit them often, including yesterday.

I am also a strong advocate for wilderness and wilderness values. As a part of this I have been involved in the California Desert Protection Act of 1994 that changed Joshua Tree, and Death Valley from Monuments to National Parks and created the Mojave Preserve. In 2008 I was involved in additions to the John Muir Wilderness administered by the USFS. Currently I am fighting a proposed gold mine in the Inyo Mountains on the doorstep to Death Valley and are involved in many issues affecting wildlife populations and human impacts to our local environment.

I am also a credentialed mountain guide, a climber, a mountaineering and a canyoneer with over 60 years of being in mountains world-wide. I have been a permittee with USFS permits for 40 years. It is in this context that my ability to recreate and work in the mountains that surround me being severely impacted by these proposed regulations.

As a person intimately familiar with anchors of all sorts the proposal strikes me as poorly informed, poorly thought out, has unintended consequences and will be unenforceable.

The USFS is setting themselves up with unrealistic expectations.

Are these anchors truly "Installations" as the USFS wants them to be?

By classifying them as such, then the USFS is locked into undertaking an MRA analysis for every single anchor. And then every MRA decision will open up the agency to litigation with the process adding an unnecessary bureaucratic step for managing climbing.

The draft states;

"Determine whether placement or replacement of fixed anchors and fixed equipment in wilderness is the minimum necessary for administration of the area for Wilderness Act purposes by conducting a Minimum Requirements Analysis. The determination must include an analysis of whether placement or replacement of fixed anchors and fixed equipment is the minimum necessary to facilitate primitive or unconfined recreation or otherwise preserve wilderness character. The determination must explain how and why the conclusions in the analysis were reached."

The first issue is locating them all in Wilderness. The Sierra Nevada is 150 miles long and 50 miles wide, spanning several national Forests.

Does the USFS has qualified and trained staff who have the skills necessary to conduct and evaluation? Does it have the funding to complete that analysis?

Anchors degrade over time and in the high mountains are subject to freeze-thaw action. Often times in locations that see less use, years may pass between use. Any backcountry user needs the ability to quickly replace a poor anchor when encountered otherwise safety and life are potentially at risk.

An unknown federal employee is not a substitute for an experienced person making on the ground immediate decisions involving safety. If the USFS conducts an MRA, evaluates an anchor and approves it this then makes them liable for maintaining it to an appropriate standard despite the legal language included in the draft as an

attempt to avoid responsibility. Do you want this to be tested in court?

It is assumed that once evaluated the anchors will remain there. Mountain and desert environments are extremely dynamic and change far faster than any government agencies ability to evaluate and process any proposals.

Outside of Wilderness, in the Bishop area a very popular front country climbing destination is Pine Creek. As of writing there are about 630 climbing routes here. Let's say that each route has 10 bolts/anchors in this one location for a total of 6300 anchors for the USFS to conduct an MRA on. Will that really happen?

Additionally Pine Creek is in Non-Wilderness USFS administered lands. A Management plan for these lands has not been done at all, although it has been promised since at least 1990.

The USFS guidance also proposes some concerning and confusing proposals for the management of climbing in non-wilderness areas. The USFS non-wilderness proposal states that the, "placement and replacement of fixed anchors and fixed equipment are appropriate outside wilderness where their placement and replacement are not restricted or prohibited in the applicable climbing management plan."

This language seems to say that outside of USFS wilderness, fixed anchor placements are appropriate unless restricted by climbing management plan-meaning that until a climbing plan expressly restricts anchors, placements.

So, what then is the status of anchors in Pine Creek? They seem to be in some sort of a USFS limbo.

The NPS is currently developing their own plan and there are commonalities between the two; but also, differences. The Sierra Crest marks the divide between the Inyo National Forest and Sequoia/Kings Parks and also Yosemite Park. There are already conflicting and confusing regulations across this arbitrary line - for example fire elevational limits and seasonal fire restrictions. Surely the NPS and USFS can cooperate enough to come up with one set of coherent regulations that do not change with one stride across the crest.

Finally, I have to ask; Why this: why now.

The problems besetting the parks and their environment are huge and with the reality of a changing climate, dying species, fires, over visitation, etc., etc., is this really where the NPS want to devote its time and resources. Is this an individual's pet project to be completed before retiring?

If the USFS is truly devoted to maintaining a "natural, untrammled, undeveloped", I will support that goal. Let's remove the bridges, the trails, the signposts, the backcountry cabins, the bear boxes and hangs, the communication towers that are eyesore on high ridges but are deemed necessary for "management of wilderness". Then let's get rid of the anchors.

I can get on board with that and I believe that some of the originators of the Wilderness Act such as Mardy and Olaus Murie would also be.

I suggest that the USFS looks again at this proposal and works directly with interested parties to craft a document that better reflects the reality on the ground and meets the needs of a large and dedicated user groups.

I am sure that most of us are more than willing and ready to work with the USFS to have a good strong and enforceable policy. As written now this document will not achieve any of this and will alienate groups that normally are amongst some of the USFS strongest supporters.

Respectfully yours
Robert Parker