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Comments: Comment Against FSM 2355 Climbing Opportunities #ORMS-3524

As an avid rock climber with lots of experience climbing in wilderness areas, and the Vice President of the High Desert Climbers Alliance, I greatly appreciate that climbing is officially recognized as an appropriate use of USFS wilderness land. I look forward to reviewing and providing feedback on the climbing management plan during the public comment period. I honestly believe that chapter 2355 of FSM 2300 is drafted in good faith with the climbing community, and that the majority of the climbing community is aligned with the intent of the proposed language. No one wants to see wilderness areas "grid-bolted", with lots of sport climbs utilizing bolts and other permanent anchors as lead-climbing protection. Most climbers would agree that the character of climbing in wilderness areas should remain wild, and that climbers should protect their vertical progress by using clean-climbing principles to the maximum extent possible (clean climbing, or trad climbing, is to climb using protection that is temporary and can easily be removed from the rock without damaging the rock, such as nuts, hexes, or spring loaded camming devices). However, there is one aspect of the proposed language that I believe will have unintended negative consequences and should be changed; and that is to classify a permanent anchor as an Installation. To state that a bolt or permanent anchor will never be required in a climbing scenario is short-sighted, and in fact the greater majority of climbs require fixed anchors. Even those climbs that are protected entirely with trad gear often require fixed anchors to enable the climbers to safely descend from the route without leaving behind lots of personal equipment. I believe that the USFS is trying to accommodate this use by allowing fixed anchors if they meet the criteria of an MRA. An MRA is not appropriate to evaluate the appropriateness of a fixed anchor for many reasons. Fixed anchors, when selected and installed correctly, are incredibly innocuous and do not impact their surrounding environment. Two stainless-steel bolts, painted to match their surroundings (as is common, recommended practice), in the middle of a cliff face are much less noticeable and impactful on the environment than a hiking trail, trail sign or other installation that might be used to guide wilderness users in horizontal terrain. First ascents in wilderness would be rendered an impossibility under this standard. Climbers questing into the vertical unknown have no way of knowing if a permanent anchor will be required prior to leaving the ground, and as an essential piece of their safety system it is not appropriate for climbers to also have to consider legal ramifications when deciding how to protect their ascent or descent. Additionally, climbing in wilderness settings is an incredibly esoteric, skilled activity. Land managers who are performing MRAs of permanent anchors would be required to have an in-depth knowledge of climbing methods and practices, and it is not reasonable to expect that land managers will have this specialized knowledge that is required to make an educated ruling.

For a climber to be able to safely descend from a climb, a fixed anchor is an absolute necessity, unless a walk-off is possible, however these are exceedingly rare. Therefore, to state that climbing is an allowed use of USFS land but that permanent anchors are considered installations is contradictory. If climbing is allowed, then fixed anchors must also be allowed and not subjected to the MRA process.

There is also fear in the climbing community that wilderness land managers do not have resources or budget to complete an MRA for every permanent installation, and that therefore land managers will be incentivized to take the path of least resistance by saying that no permanent anchors meet the criteria for exception under an MRA, or that the MRA review process will drag on for years. This fear is compounded by the number of existing fixed anchors in wilderness areas, all of which would require an MRA. With so much other important work that land managers are required to perform, it is not unreasonable for climbers to expect such an outcome. With no appeals process or grandfather clause for existing permanent anchors, climbers are at the mercy of the local land manager's whim.

Instead, I would suggest that the USFS introduce language that fixed anchors are not installations, however that they should be used to the minimum extent practical as defined by the local land manager, with an appeals process should a disagreement arise. I suggest that the USFS should prioritize the safety and appropriate installation of fixed anchors, rather than debate over whether or not climbers are allowed to use them. Climbers will continue to climb, especially given that it is an appropriate use of wilderness, and to install barriers in the responsible use of fixed anchors is to install barriers in the implementation of an essential safety item. This increases the risk of accidents and will increase the strain on search and rescue teams, most of whom are already spread thin on minimal budgets and volunteer crews.

Thank you for taking the time to review and consider my comments. This is a very important issue to me.