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Comments: To Christopher French, Deputy Chief, National Forest System:

I write to you concerning the "Forest Service Manual 2300" concerning the amendment of section 2355 which "establishes code, caption, and sets forth direction on Climbing Opportunities on National Forest System lands". I left a similar comment on the related NPS draft manual for a similar topic, but I find the NFS draft amendment to actually be more excessive in its reach and more transgressive than the NPS proposal. The comments below all still hold, though.

I write you as someone who would be significantly impacted by this policy- I am a climber who has climbed in the wilderness areas of multiple national parks and national forests, including most wildernesses (e.g. Ansel Adams, Hoover, John Muir) in the High Sierra section of the Sierra Nevada, and has placed bolts (by hand drill) in those wildernesses.

I have listened to many of the voices in the climbing community about the impact of this policy/draft manual but come with my own voice, my own reading of the draft, and a decent amount of introspection about the meaning of wilderness and the role for fixed anchors, or related "installations" therein, play in the conception of wilderness. I have reread some of my favorite selections from Edward Abbey, Aldo Leopold, and Roderick Frazier Nash to help clarify my thinking about the 'best' conception of wilderness on the American continent.

To be as brief as possible: while I sympathize with the idea of regulating fixed climbing anchors to prevent overuse and "over-loving" a wild place that has likely increased in popularity in recent years, this draft is an overreach and unnecessary in most cases (in my opinion).

As to why I think the draft is an overreach:

- Most climbing routes follow a Pareto law- 20% of climbs get 80% of the traffic (or some similar proportions). There is certainly over-bolting, overuse, and abuse in concentrated areas. I believe we should regulate those areas specifically on a case by case basis. As the Pareto law suggests, this would solve most problems. Examples of this already being done include Big Wall Wilderness Permits in Yosemite Valley- which I think are a good thing!
- I speak of Pareto laws for locations that may benefit from better fixed anchor regulation. I think there are also policies that already exist that follow similar laws. The most notable one to me is the ban in wildernesses on power drills (or anything motorized for that matter). If the ban on power drills were enforced (good!) and made customary between climbers and climbing rangers, I think this would also resolve a great deal of problems the draft purports to address.
- An overreach in the definition of what would require a Minimum Requirements Analysis (MRA) to me is the vagary of what constitutes an installation. An astonishing item required to be addressed are slings (i.e. "tat"). What about fixed nuts? I have left nuts and slings behind before when bailing off numerous Sierra peaks. This technically violates LNT, but is part of the territory with climbing. The responsible thing the climbing community teaches is to "pay it forward" in return and do your part to prevent mountains from being overrun with bail gear- cut old tat and take it with you, and clean old abandoned gear (or declare it booty) so it doesn't tarnish the rock. How does an MRA manage the myriad definitions of what can become an installation or fixed anchor? Even pitons can be removed- and I have done so when returning to a climb I established when I came with better (removable) gear. Is the MRA even well-defined or actionable in these circumstances?
- Another remarkable overreach MRAs is the foreknowledge required for first ascents. How can one know the details of a climb that is yet to be established without going up first? I have plans to establish a route on a face along the White Divide in 2024 that I saw from a hiking trip long ago. I will bring some pitons and a few bolts and

a hand drill as mechanisms of very last resort if no other options are left to me- but I do not know what I will encounter! Again, is an MRA well-defined or actionable in these circumstances?

As to why I think the draft is unnecessary (in its current form):

- The reasons are here are somewhat the complement of the previous points. In places that are truly wild, there are few examples of bad actors being irresponsible or countering the spirit of wilderness as it exists in the American mind. In remote places like where I have been- for example, in the Gorge of Despair along the Monarch Divide in the SEKI wilderness- there is no example of over-bolting. It is simply logistically infeasible to ruin such a place, should any individual of a skewed mind even want to. In the places that are most truly wild, where no individual may question its nature as that of wilderness "proper", the problem is non-existent and nearly self-enforcing by virtue of logistical and terraneous remoteness- remoteness I fully hope is never rescinded from the laws that govern our wilderness.
- This brings up a related point about enforcement: outside the most populous areas, which I recommended above be treated on a case-by-case basis and regulated, how will enforcement occur in the most remote areas?
- Underlying many of the comments above is that the climbing community is, on the whole but consistently so, self-regulating. There are not bolt ladders plastering the wilderness areas of the United States. The fact that bolting of any kind in remote areas whacks a hornet's nest of feverish discussion in climber forums is an attestation to the deep consideration climbers give to the land we climb on- often considered the closest (or actual) thing to sacred many of us have. Whenever I go into NPS wildernesses to (try to) establish a new route, I almost always consult with rangers, and ideally climbing rangers, about my intentions beforehand.
- The fact that bad actors can be pointed to in specific instances of malfeasance is another case in point that climbers are overwhelmingly thoughtful users-nay, stewards- of the land. This draft threatens to transgress the old adage- "if ain't broke, don't fix it"- and spoil the good will that has existed between climbers and the deep respect we have for the federal government's choice of how to manage its land.

Summarizing, I sympathize with some aspects of the draft amendment, and I am glad the NFS is addressing it and thinking about it! However, I find a great part of it to be overreach and/or unnecessary. I think passing the draft as is will do a great deal of harm to the relationship of trust between climbers and the federal government that has developed in formal and informal channels over the decades, and result in a less coherent notion of wilderness in our collective American minds.