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Comments: These comments pertain to both US Forest Service Proposed FSM 2355 Climbing Directives and US National Park Service Draft Authorization Process for Fixed Anchors in Wilderness. Both of these documents rely on a Minimum Requirements Analysis (MRA) for the management of fixed climbing anchors, and the focus of my comments is on the implementation of the MRA as a management tool.

I have been climbing for over fifty years, and been conducting search and rescue activities for over twenty-five years on Park and Forest wilderness lands, including numerous first ascents and technical rescues. Most of these activities have been in California's Sierra Nevada, and I have climbed in Washington, Oregon, Idaho, Colorado, Arizona, Nevada, and Alaska as well. I am a supporter of wilderness designation, preservation, and effective management.

My principal concern is that the the MRA process is impractical to complete in a timely way, and would thereby result in indefinite closures, prohibitions against maintenance of existing fixed anchors, and/or prohibitions against establishment of new climbing routes. How can the minimum requirements for thousands of presently existing climbs in federal wilderness be analyzed in any timely fashion? Who is qualified to make such judgements on behalf of all future parties climbing any given route? When would there be funding for such a huge effort? My request is that the guidance documents recognize that the only practical way to succeed is for the federal agencies to work with local and national climbing organizations to develop management plans that ultimately rely on the discretion of climbers themselves to place and maintain anchors in a safe responsible way that respects wilderness values.

Further, I ask that the guidance documents recognize that search and rescue operations may require the installation of emergency permanent anchors in wilderness. The responsibility for search and rescue on many wilderness lands is the responsibility of local agencies such as county sheriffs and their volunteer rescue teams. These teams are well versed in analyzing what the minimum requirements are for conducting rescues in a safe and effective manner. Any additional guidance from land management agencies is unnecessary.

To be honest, given how little impact fixed climbing anchors have on the environment or on non-climber wilderness users, this effort seems to me to be a tempest in a teapot. Management of climbing anchors will have a negligible effect on the environment or the average users experience. As such, it may become a low priority for agency staff to allocate scarce resources to finalization of management plans. In that event, I ask that the default be the status quo - climbers use their resources and judgement to take care of installation and maintenance of anchors; power drills are prohibited in wilderness; and search and rescue teams do their thing without procedural impedance from land management agencies.

Thank you for consideration of these comments.

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