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First name: Andrew

Last name: Wiesner

Organization:

Title:

Comments: Thank you for the opportunity to provide comments to the proposed Draft Forest Service Manual 2355 - Climbing Opportunities ("Draft FSM 2355"). I am a 54-year-old rock climber based in New Paltz, New York. I have been climbing since I was a teenager. My experiences climbing in America's great outdoors (including wilderness and non-wilderness areas administered by the National Forest Service, such as Coronado National Forest, The Sangre de Cristo Wilderness is located in the San Isabel and Rio Grande National Forests in Colorado, and Pisgah-Nantahala National Forest) have been among the most memorable and formative experiences in my life. The values skills and habits that climbing has imparted to me, including conservation, thrift, personal accountability, responsible risk taking, self-reliance, trust in others, empathy, and health and fitness, have informed and enriched my life immeasurably. I have shared with my climbing partners unforgettable moments of vulnerability and triumph, and together we have borne witness to the overwhelming beauty and power of the natural world.

Climbing has grown considerably in popularity over the years, and I understand this growth presents a challenge to federal land managers. On the one hand, climbing, as a primitive and solitary form of outdoor adventure and exploration, fulfills the meaning of wilderness and is entirely consistent with the Forest Service's guiding objective to manage all lands under its authority pursuant to a "sustainable multiple-use management concept to meet the diverse needs of people." On the other hand, climbing's unregulated growth may impact our nation's national forests in ways that are not consistent with purpose of wilderness or the mission of the Forest Service.

I believe climbing in wilderness areas should be regulated, and that it is appropriate and desirable for the Forest Service to lead the way by adopting national guidelines for regulating climbing in the wilderness areas it administers. Specifically, I would support national policy guidelines that include the following:

- An acknowledgement that climbing is a legitimate and appropriate use of wilderness
- An acknowledgement that climbing relies on the use of fixed anchors, and that fixed anchors do not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act
- A requirement that each administrative unit that contains one or more climbing opportunities develop a climbing management plan, that the public have the opportunity to comment on such plans prior to their finalization, and that deadlines and milestones be imposed on District Rangers for the planning process.
- Local climbing organizations should be consulted and involved in the planning process.
- No District Ranger or other official may arbitrarily, and without basis in law or established national-level policy, prohibit climbing or the appropriate and approved use of fixed anchors that climbing requires. Any decision that actually or constructively results in a partial or total ban on climbing should be subject to EIS review.
- The placement and replacement of fixed anchors for climbing, except for SAR purposes, should be performed by the climbing community and not by park administrators.
- A prohibition on the use of power drills in connection with placing or replacing fixed anchors in wilderness.
- A prohibition in wilderness on permanent installations of rock climbing equipment, such as fixed ropes or perma-draws, whose use exceeds the de minimis standard of being "substantially unnoticeable"
- An endorsement of "clean climbing" techniques, such as the use of removable anchors in natural weaknesses in the rock, and only the sparing use of expansion bolts to occasionally link such features or facilitate descent

In non-wilderness areas administered by the Forest Service, where climbing opportunities exist, there should also be a national requirement that administrative units produce climbing management plans, and that deadlines and milestones should be imposed on District Rangers for the planning process. I believe that for these areas the standards outlined above for wilderness areas should also apply, provided that the Forest Service should programmatically tolerate a higher level impact from climber's recreational use. Specifically:

- Power drills should be permitted for placing expansion bolts

-A high-quality user experience, not a minimalist ethic, should be the standard for the acceptable use of fixed anchors for climbing.

-Other permanent climbing equipment (e.g. fixed ropes, perma-draws) that exceeds the de minimis standard of "substantially unnoticeable" in the wilderness act, should be acceptable in non-wilderness areas administered by the Forest Service.

I am strongly opposed to the regulatory framework proposed in the Draft FSM 2355.

-The proposed policy mistakenly identifies fixed anchors as "installations" under the Wilderness Act, thereby prohibiting them without prior authorization via minimum requirements analysis (MRA).

-I believe MRA is the wrong regulatory tool because its application to fixed anchors placed by climbers is inconsistent with existing law and policy.

-I object to any requirement that fixed anchors placed by climbers be subject to prior individual approval.

The components of Draft FSM 2355 to which I object, if implemented, will result in an unacceptable curtailment of legitimate and appropriate climbing opportunities in wilderness and non-wilderness areas administered by the Forest Service.

In the following paragraphs I submit my detailed commentary on the specific language in Draft FSM 2355 and explicate the objections to it that I have enumerated above.

Fixed Anchors Are Not "Installations"

-Draft FSM 2355 mistakenly identifies Fixed Anchors in Wilderness Areas as prohibited installations which, under the Wilderness Act as it has been interpreted and implemented, are required to undergo MRA prior to authorization.

-Although the Forest Service does not have national level policy regarding climbing management, the National Park Service has addressed the issue in its Director's Order 41, which takes a more thoughtful approach by:

oRecognizing climbing as a "legitimate and appropriate use of wilderness;"

oConceding that "the use of removable anchors" in climbing "may reduce, but does not in every case completely eliminate, the need for fixed anchors;" and

oAcknowledging that fixed anchors do "not necessarily impair the future enjoyment of wilderness or violate the Wilderness Act."

-Draft FSM 2355 also contradicts the Wilderness Act itself, which promotes "outstanding opportunities for solitude or a primitive and unconfined type of recreation" and requires that the impact resulting from such recreation be "substantially unnoticeable," but not prohibited in a manner that would effectively eliminate the opportunity for such solitude and appropriate recreation.

MRA Is the Wrong Regulatory Tool Because its Application to Fixed Anchors Placed by Climbers is Inconsistent with the Wilderness Act

-In the Wilderness Act, the concept of "minimum requirements" is reserved for administrative uses of wilderness areas. It is not appropriate to apply the concept to the regulation of user impact, including appropriate placement of fixed anchors by climbers.

-Fixed anchors should not be misinterpreted as "Installations" under the Wilderness Act, but rather should be considered recreational user impact, and as such they are not prohibited by the Wilderness Act, but are subject to the Act's de minimis standard that such impact be "substantially unnoticeable."

-In fact, fixed anchors are commonly placed by climbers specifically for the purpose of conservation. For example, a bolted rappel station is substantially unnoticeable, and may be put in place to direct climbers to descend over durable surfaces (e.g. the rock face) and away from sensitive flora at the top of a cliff. This use of fixed anchors in this manner, in its de minimis impact and preservation of the "untrammelled" and "primeval" character of wilderness, is entirely consistent with the Wilderness Act.

Any requirement that new or replacement fixed anchors be subject to individual prior approvals or permitting is

impractical, compromises safety, and will result in the severe curtailment of appropriate climbing recreation in wilderness and non-wilderness areas.

-A climber's decision to place a fixed anchor is based on in-the-moment observations of oftentimes unforeseeable conditions related to the climb and its immediate environment. For example:

- oClimbers who recreate in wilderness celebrate a traditional style of new route development that involves an unrehearsed, ground-up approach that prioritizes adventure and exploration and epitomizes the type of "primitive and unconfined recreation" that the Wilderness Act protects. In addition to fulfilling the purpose of the Wilderness Act, new route development has the added benefit of reducing impact by dispersing use over more climbing opportunities.

Traditional climbing style also embraces a self-imposed "clean climbing" ethic that employs, where available, removable anchors placed in natural weaknesses in the rock, and resorts to placing fixed anchors only rarely, and only in instances where such natural weaknesses are unavailable, or the fixed anchor is required to facilitate descent.

Beyond these general criteria, it is impossible to predict in advance with any specificity where and how fixed anchors may be placed in the context of new route development. Consequently, any requirement that fixed anchors be subject to individual prior approval would be tantamount to a prohibition on new route development.

- oClimbers repeating existing routes will sometimes resort to leaving new fixed anchors to facilitate unplanned descents. This may happen in the case of self-recue from injury or dangerously deteriorating weather conditions, or if they accidentally climb off-route into an impasse, or even if they find, as sometimes happens in adventures, that they simply aren't up to the challenge. It would be prohibitive, unreasonable, and unsafe to force climbers practicing an appropriate form of recreation to choose between placing a necessary fixed anchor of this type for the purpose of unplanned descent and complying with park regulations requiring prior individual approval for such a placement.

- oFixed anchors placed by climbers are monitored, maintained, and replaced by climbers. As a user group we pool our resources, develop tools, and acquire skills to identify and replace aging fixed anchors that may no longer be safe. Climbers have organized and funded a national volunteer organization (The American Safe Climbing Association) and many local volunteer climbing organizations to support this effort. We trust our lives to these fixed anchors, they protect us when we fall, and we rely entirely on them when we descend. Any requirement that fixed anchor replacement be subject to prior individual approval will impede and discourage volunteer bolt replacement activities and result in a less safe climbing environment.

Thank you for considering my comments.

Andy Wiesner

New Paltz, New York