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Comments: I vehemently object to the proposed FSM 2355 Climbing Opportunities section permitting placement, replacement, and maintenance of fixed climbing anchors in designated Wilderness areas. The Wilderness Act (16 U.S. Code 1133(c)) forbids such "structures" and "installations" in order to protect Wilderness's wild character: They must be prohibited in all Forest Service Wilderness areas.

The Forest Service's duty is to protect Wilderness in its natural, untrammeled state, not to develop opportunities for "primitive recreation" within it. Wilderness, by definition, already provides such opportunities: Development is unnecessary. Furthermore, the law already permits exceptions to the prohibition of structures and installations, such as in "emergencies involving the health and safety of persons within the area" (16 U.S. Code 1133(c)) and when necessary to protect Wilderness in its natural, untrammeled state, but such exceptions are rightfully rare. The Forest Service cannot override the general prohibition on structures and installations from a desire to facilitate or enhance a particular form of recreation, as the directive proposes to do for climbing. Such a narrow exception does not extend to the general public seeking to create developed recreational opportunities in designated Wilderness.

Climbing without permanent fixed anchors is compatible with Wilderness and provides a form of primitive recreation. There is a long history of climbing without such anchors. Certainly, fewer people will be able to climb certain routes within Wilderness without them, but letting Wilderness impose its own limits is fine. Part of the thrill and challenge of "primitive recreation," such as climbing without these anchors, is recreating while accepting the limits that the landscape creates and respecting it and the creatures that live within it, leaving no traces of human presence or development behind. As 16 U.S. Code 1131(c) states, "the imprint of man's work [is] substantially unnoticeable" in Wilderness. Permanent fixed anchors are substantially noticeable works that degrade Wilderness's character and thus must be prohibited.

Climbers who desire developed climbing opportunities can find a plethora of them outside Wilderness areas, including numerous permanently bolted routes. Less than 3% of the Lower 48's land is designated Wilderness: It is an endangered landscape under threat from many sources, including rapidly rising pressure for developed recreation. Do not create an exception to the structure and installation prohibition for recreation. If anything, the Forest Service should work to remove existing permanent fixed anchors.

Even when permanent fixed anchors are allowed (as for emergency purposes as I stated earlier), every specific proposal for such installations must be subjected to public notice and opportunities for public comment per the National Environmental Policy Act (NEPA).

Thank you for your consideration.